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BEFORE THE ARIZONA CORPORATION COMMISSION

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CORP COMMISSION
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IN THE MATTER OF THE)
INVESTIGATION INTO)
US WEST COMMUNICATION,)
INC.'S COMPLIANCE WITH)
THE § 271 OF THE)
TELECOMMUNICATIONS ACT)
OF 1996)

DOCKET NO. T-00000A-97-0238

Arizona Corporation Commission

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**COVAD COMMUNICATIONS COMPANY'S BRIEF ON
QWEST CORPORATION'S CHANGE MANAGEMENT PROCESS**

Covad Communications Company ("Covad") respectfully submits this Brief on Qwest Corporation's ("Qwest") Change Management Process.

I. INTRODUCTION

An effective change management process ("CMP") – pursuant to which Qwest communicates to CLECs system, process and product changes -- is an integral component of competitors' ability to compete in a meaningful manner with Qwest.¹ In the absence of an adequate change management process, Qwest can impose substantial and anti-competitive costs and burdens on competitors by making changes to its products,

¹ In the Matter of Application of Verizon Pennsylvania, Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks Inc. and Verizon Select Services Inc. for Authorization to Provide In-Region, Inter LATA Services in Pennsylvania, CC Docket No. 01-138, App. C, ¶ 41 (Sept. 19, 2001) ("Verizon Pennsylvania 271 Order").

processes, services and systems without providing CLECs with adequate notice, opportunity to provide input, testing and documentation.² It is precisely because of concerns about Qwest's ability to hinder and harm competition in the absence of an effective and procedurally sound change management process that the "CMP redesign" effort was undertaken.

Currently, because the redesign process is not proceeding as quickly as Qwest anticipated, Qwest has become less willing to address CLEC concerns. Indeed, Qwest has reverted to conduct that caused CLECs to challenge the adequacy of Qwest's change management process in the first place. Yet, even as the process slows down and becomes bogged in dispute, Qwest claims it has a Section 271-complaint CMP. Nothing could be further from the truth. Far from being fully resolved and in compliance with the FCC's requirements for a change management process, the CMP continues to be subject to additional challenges by CLECs (soon to be categorized as impasse issues) and is replete with procedural deficiencies that show that Qwest has not established an adequate plan to control change. Even worse, where progress has been made, Qwest has shown that it is unwilling or unable to comply with the agreed-upon terms of a particular agreement. Qwest thus cannot be found to be in compliance with its obligations under Section 271 at this time.

In addition to the issues identified herein, there will be impasse issues arising out of CMP that will have to be resolved by the Commission. Covad anticipates identifying most, if not all, impasse issues following the CMP redesign meeting on January 22-24, 2002 in Denver, Colorado.

² *SBC Texas 271 Order*, ¶107.

II. ARGUMENT

A. **The CMP Is Not Section 271 Compliant Unless and Until It Includes Redesigned Methods and Procedures for System, Product and Process Changes.**

1. **The FCC's Section 271 Orders Do Not Give Qwest a "Free Pass" on Its Product and Process CMP.**

Qwest now contends that it possesses a Section 271 sufficient change management process to the extent that its "redesigned" CMP includes provisions relating to OSS/systems only. Qwest's current advocacy regarding the scope of the CMP redesign/271- satisfactory CMP likely is grounded in FCC orders approving the Section 271 applications of other BOCs. There is no affirmative legal or factual basis however, for Qwest's new position that its CMP need only address systems. While the FCC's Section 271 orders address change management primarily with respect to system changes, the limited scope of review is due solely to the fact that the three ILECs submitting Section 271 applications do not address product and process in change management. BellSouth does not address product and process changes at all, but permits only systems changes to go through the change management or change control process. Verizon and SBC punted product changes to alternative forums, leaving their respective change management/change control processes to address only systems changes. Thus, there was neither the possibility nor the opportunity for raising product and process changes to the FCC in connection with the Section 271 applications of other BOCs.

Qwest cannot point to a single affirmative statement of the FCC suggesting that CMP for product and process is not equally critical to the Section 271 inquiry as is CMP for systems. That silence speaks volumes; there is absolutely no indication in the FCC's Section 271 orders that product and process change management is not a Section 271 issue when the CMP regularly is used to impose undue, unwarranted and improper operational burdens and increased costs on CLECs which hamper their ability to compete. To the contrary, the FCC's Section 271 review is designed to ensure that the

BOC applicant offers interconnection and access to UNEs on a nondiscriminatory basis, such that competitors have a meaningful opportunity to compete with the incumbent LEC.³ In the absence of any principled basis upon which to distinguish systems from product and process, therefore, general principles underlying the Section 271 review process control. Thus, Qwest's use of the CMP to "notice and go" product and process changes represents a material and realized threat to competitors' ability to compete, and Qwest may not be deemed to have satisfied its obligations under Section 271 unless and until the systems, process and product CMP have been redesigned to ensure that Qwest's ability to control the network does not become another means by which it can suppress competition.

Critically, it is now beyond dispute that change management is a significant factor in the FCC's evaluation of a BOC's Section 271 application. As Chairman Powell made clear in his announcement regarding the withdrawal of BellSouth's application for Section 271 relief in Georgia and Louisiana:

BellSouth's application demonstrated the company's commitment and ability to make significant progress toward satisfying the statutory requirements and our precedents. . . . Yet, despite extensive conversation and collaboration with the FCC, *questions remain regarding* whether BellSouth has satisfied the rigorous requirements of the statute and our precedents, including *the adequacy of the company's ... change management process and related issues*. See *Exhibit 1*, attached hereto (emphasis added).

Just like the issues identified in connection with BellSouth's change management process, see KPMG Consulting's Florida BellSouth OSS Test Evaluation Status, attached hereto as *Exhibit 2*, numerous of those issues exist currently in Qwest's change management process. Thus, to the extent BellSouth's CMP was deemed deficient and non-compliant with Section 271, so too must Qwest's.

³ BANY 271 Order, ¶ 44.

2. Qwest Has Raised Product and Process CMP to the Level of a Section 271 Issue First By Creating Product and Process CMP and Then By Agreeing to Redesign Product and Process CMP In Order To Take CMP Out of the Section 271 Workshops.

The issue of product and process change management is not a creature of CLEC imagination. To the contrary, Qwest initiated the CMP for product and process over one year ago, presumably on the basis that Qwest identified a need and desire for an industry forum by which to address product and process changes as well as changes to systems. Because Qwest created a change management process for product and process, it must now live with that decision and subject its systems, product and process CMP to state and federal Section 271 scrutiny. Qwest may not be permitted to place two entire categories of its CMP into a “lockbox,” not subject to Section 271 review, because it says no review should apply. Indeed, as set forth more fully below, Qwest adopts this position now because it knows a review of its product and process CMP will derail its Section 271 applications:

- (1) Through product and process CMP, Qwest unilaterally changed the terms and conditions of the SGAT and CLEC interconnection agreements without the bother or hassle of the amendment process;
- (2) Through product and process CMP, Qwest unilaterally imposed new or non-IA rates upon CLECs without going through a state commission cost proceeding, arbitration or IA amendment process; and
- (3) Through product and process CMP, Qwest unilaterally created and imposed upon CLECs new products that are not contained in their IAs without IA amendment.

Far from being a vehicle to effectuate CLEC changes and improvements, the product and process CMP has been Qwest’s favored method for taking advantage of CLECs, imposing anti-competitive burdens, obligations and charges on CLECs, and altering the business and contractual relationship with CLECs. Thus, between Qwest’s decision to create product and process CMP, and its free abuse of that process to

effectuate anti-competitive and unilateral changes, the product and process CMP must be subjected to Section 271 scrutiny.

The expansion of CMP to include product and process, and the importance of its role in the management of the long-term relationship between CLECs and Qwest so that the competitive playing field remains level, is reinforced in Qwest's SGAT. For example, Section 1.7 of the SGAT provides a role for the CMP in connection with the introduction of new products:

1.7.1 Notwithstanding the above or anything contained in Section 1 of this Agreement, if the Commission orders, or Qwest chooses to offer and CLEC desires to purchase, new Interconnection services, access to additional Unbundled Network Elements, additional ancillary services or Telecommunications Services available for resale which are not contained in this Agreement, no formal amendment to the Interconnection agreement is necessary. Qwest will notify CLEC of the availability of these new services through the product notification process through the Co-Provider Industry Change Management Process (CICMP). CLEC must first update the relevant section(s) of the New Product Questionnaire to establish ordering and billing processes. Then by placing its orders, CLEC agrees to abide by all of the then current rates, terms and conditions as set forth in the then current template agreement applicable to such new services. If CLEC wishes to negotiate an amendment with different terms and conditions than defined in the then current template agreement, CLEC agrees to abide by those terms and conditions until the amendment is approved and a parallel processing letter agreement is executed.

Section 7.4.7 similarly delineates a key role for CMP in connection with process:

7.4.7 Qwest will establish intervals for the provision of LIS trunks that conform to the performance objectives set forth in Section 20. Qwest will provide notice to CLEC of any changes to the LIS trunk intervals consistent with the change management process applicable to the PCAT. Operational processes within Qwest work centers are discussed as part of the CLEC Industry Change Management Process (CICMP). Qwest agrees that CLEC shall not be held to the requirements of the PCAT.

Further, Staff recently recommended another role for CMP in connection with productization:

476. CLECs contend that if a product were technically feasible within Qwest's network, a technically feasible type of interconnection has been created and should be made available to all CLECs on a standardized basis, and to do so, Qwest should create a product and provide product-like cost support. Qwest agrees that there are times when a BFR should be productized, but disagrees with the notion of an arbitrary or predetermined number of BFRs, preferring to rely on judgment based on experience. Staff suggests that Qwest, with CLEC input, develop a series of criteria that would accelerate the productization of BFRs and that this process should be incorporated within the CICMP and subsequently by provisions within the SGAT. Staff, therefore, concludes that this issue should be resolved in favor of the CLECs.

Qwest cannot avoid the issues that its own use of CMP have created. Qwest has injected CMP into all aspects of its relationship with its wholesale customers. The entirety of the CMP is therefore open to Section 271 review.

Critically, Qwest's new position that systems change control is all that is required for CMP to be Section 271 compliant reflects a reneging on its earlier commitment to redesign the entire CMP process, including product and process, and to bring back the completely redesigned CMP for CLEC and Commission review. As Qwest stated during a pre-hearing conference in Washington, Qwest took CMP out of the Section 271 workshops and into the CMP forum ostensibly on the basis that the work required to redesign CMP so that it met CLEC needs could be done by the actual CMP participants. Qwest did commit, however, to bringing the finalized CMP documents back into the Section 271 workshops in order for final comment and briefing by the parties. *See Exhibit 3*, attached hereto. At no point did Qwest suggest that the only area that would be the subject of redesign and CLEC comment/briefing for purposes of Section 271 was systems.

Qwest cannot now undo its promises; it must be required to adhere to the representations it made that induced CLECs to agree to redesigning CMP in the CMP forum rather than in the Section 271 workshops. Had CLECs – or at least Covad –

known of Qwest's plan to drop product and process from the scope of the Section 271 review, it never would have agreed to removing CMP as an issue from the 271 hearings.

3. Qwest's Conduct In Using CMP for Product and Process Changes Demonstrates that It Is A Section 271 Issue Because Of the Competitive Impact and Because It Reflects the Fact that CLECs Have Not Had Substantial Input Into the Design and Continued Operation of the CMP Thus Far.

Qwest's recent and current conduct demonstrates the absolute need for a procedurally sound and adequate change management process for product and process. For example, during the January, 2001 workshop on interconnection and collocation, AT&T introduced into evidence 2 ATT 20, which is a document entitled "Qwest Collocation Policies and Performance Requirement 2001 Update" (the "Update"). As AT&T pointed out in testimony in Colorado, "there are a number of places in [the Update] that are in contradiction with the SGAT, and have some interesting new written changes on some of the collocation policies"⁴ Covad echoed the concern raised by AT&T with regard to the Update:

I have accepted probably 75 to 100 collocations from Qwest, and maybe 30 to 40 percent of the time, 50 at most, I have been asked to sign off on [the Update] and agree to the terms and conditions. I wasn't really happy about doing it at the time because the terms and conditions set forth in this document were not necessarily consistent with our interconnection agreement. However, basically, it was either take it or leave it. We either signed it or you don't get your collocation arrangement.

This kind of ties into the concern I voiced earlier about having references to the Qwest technical pubs in the SGAT in that there are – they could definitely impact the terms and conditions of the SGAT should Qwest exercise its stated right to change the tech pubs. There are a number of terms and conditions that I agree are totally out of line. One of them prohibits switching equipment to be collocated. And, very clearly, Washington state allows it. It doesn't

⁴ CO Trans. (WS 1) 111, 12-16 (Wilson).

necessarily here. Another thing it does, it places restrictions on parking.⁵

As both Covad and AT&T demonstrated and, more critically, as Qwest admitted, the "Update" (and internal operations documents similar to it) permit Qwest to substantially alter the terms and conditions of the SGAT as well as the interconnection agreement between Qwest and a CLEC:

I believe the intent [of the Update] is for these to work hand in hand with the interconnection agreement. *It augments the language that's been agreed to in the interconnection agreement . . . [With respect to technical publications,] Qwest does control the language that goes into the technical publications.*⁶

Qwest's pattern and practice of issuing documents like the "Update" without subjecting such changes through a procedurally sound and adequate CMP is not historical anomaly. Indeed, even as the CMP redesign team struggled with how to manage Qwest-initiated product and process changes and the parties actually had reached tentative agreement upon a process,⁷ Qwest not only disregarded that agreement but now seeks to set aside any obligation to do so altogether. Qwest obviously continues to believe that it may push through whatever changes and charges it wants to impose on CLECs, despite the anti-competitive impact necessarily flowing therefrom.

An even more recent example demonstrates the extraordinarily serious deficiency in Qwest's change management process. Pursuant to Qwest CR PC 100101-5, Qwest proposes to charge CLECs for trouble isolation charges at an already prescribed rate:

⁵ CO Trans. (WS 1) 117, 22-25; 118, 1-18 (Zulevic).

⁶ CO Trans. (WS 1) 123, 15-18 & 25; 124, 1 (Campbell).

⁷ All Qwest initiated CLEC-affecting changes would be run through the standard CMP change request process; and (2) Qwest-initiated changes that did not alter CLEC operating procedures would be issued with notice and opportunity for comment.

Currently, CLECs are responsible for testing UNEs prior to submitting a trouble report to Qwest. CLECs are to provide test diagnostics including specific evidence that the trouble is in the Qwest Network along with the associated Qwest circuit identification number. If the CLEC elects not to perform the necessary UNE testing, Qwest will offer to do such testing on CLECs' behalf. If such testing is requested by the CLEC, Qwest will perform additional testing and bill the CLEC the appropriate charges that are in their Interconnection Agreement.

If the CLEC does not provide test diagnostics and elects to have Qwest perform additional testing on their behalf, Qwest will not accept the trouble report. Additional charges may apply when the testing determines the trouble is beyond the Loop Demarcation Point. . . .

Eschelon objected to this CR on the basis that it was inconsistent with its interconnection agreement. Allegiance objected on the basis that it left open too many questions about how the new process would be applied. Covad objected on the basis that the terms of the new testing process were inconsistent with the terms and conditions contained in the SGAT. Despite these well-founded objections, Qwest stated that the CR would be implemented as originally scheduled, i.e., December 1, 2001. As a consequence, these three CLECs have escalated the issue, even as Qwest goes ahead with its plans. Attached hereto as *Exhibit 4* is the escalation request and associated documentation.

More troublesome yet, after Allegiance, Covad and Eschelon has escalated their objection to the Qwest CR on additional testing and associated charges, Qwest's "mailout" notice announcing the changes to several PCATs to reflect the new testing and charge policy stated that "no comments had been received" regarding the CR. Attached hereto as *Exhibit 5* is the email regarding the purported lack of comments on the Qwest

CR. Whether intentionally or not, Qwest ignores CLEC objections and then reports that no objections were lodged.

Another example comes in the context of purported rate true up and billing changes. On October 31, 2001, and then again on November 14, 2001, Qwest issued general announcements that it was updating the rates contained in interconnection agreements with CLECs, allegedly to reflect Commission orders and negotiated rates. *See Exhibit 6* attached hereto. As those announcements made clear, the “rate and billing verification” effort was effective “immediately” and no opportunity was provided to CLECs, like Covad, to seek clarification of the scope, nature and contractual basis of the rate changes in order to determine whether such rate changes actually were permissible under the Covad-Qwest IA.

Compounding the problems created by the lack of notice and opportunity for comment is the fact that, it was only after those announcements had been issued that CLECs learned that those policies had been issued over the objection and in disregard of an almost two year old Eschelon CR (CR PC032801-4), which had requested that Qwest provide advance notice to CLECs of rate and profile changes. *See Exhibit 7*, attached hereto regarding Eschelon’s escalation of CR-PC032801-4. The crux of Eschelon’s request for advance notification was the concern that the rate verification may not be permissible under each CLECs interconnection agreement:

Qwest’s bill “validation” process was started after Eschelon submitted its CRs asking Qwest for notice and opportunity to object before such changes were made. Qwest said that it does not plan to provide a red-line or other documentation showing each change made to date. Without such documentation, identifying and verifying the changes manually will be virtually impossible. (If Qwest cannot identify them, how are CLECs supposed to do so?)

The inability to identify, analyze, plan for, dispute, and respond to rate and profile change is a legitimate, important business need. Eschelon needs to be able to identify potential changes and, if they are valid, plan for them in its budgeting and provisioning processes. These are simply a good, efficient business practices. Qwest is preventing Eschelon from operating efficiently by not providing sensible information in advance of proposed changes. Qwest is not even planning to identify specific changes after the fact for changes that it has recently made. Therefore, an additional business impact is the expenditure of time and resources to manually attempt to find the changes and determine their financial impact. A very real possibility exists that Qwest may be unilaterally imposing terms on Eschelon that are inconsistent with Eschelon's interconnection agreement with Qwest. Qwest has prevented Eschelon from verifying this by making validation of Qwest's bills a time-consuming and unrealistic effort. Qwest should not be able to unilaterally impose such an unnecessary burden on Eschelon and other CLECs. Exhibit 7(footnotes omitted and emphasis added).

Covad recently received from Qwest a perfunctory identification of the USOC codes for the elements subject to the rate change/verification, as well as the actual change in rate that Qwest would be implementing "immediately" in its Covad billing. This identification was unclear as to the time period covered by the true up; the basis for the rate change; and what provisions of the interconnection agreement permitted the true up or change in rate. Despite the paucity of information, in its first, cursory, review of that identification, Covad uncovered errors made on the part of Qwest pursuant to which it sought payment from Covad. Specifically, Qwest seeks recovery of over ten thousand dollars for "additional loop" installations which is a clear error since Covad only orders one loop per LSR.

CLECs were not the only parties that considered Qwest's conduct in issuing CR PC 100101-5 to be questionable. KPMG, the third party ROC OSS tester, opened up Exception 3094, attached hereto as *Exhibit 8*, in response to Qwest's attempt to impose

additional testing charges on CLECs. Significantly, the focus of the KPMG exception was not the propriety, *per se*, of Qwest's conduct, but rather that Qwest's conduct in issuing CR PC 100101-5 was not consistent with the interim agreement reached by the parties in the CMP redesign effort on Qwest-initiated CRs. *Id.* Just like BellSouth, which had identified flaws in its change control process because it did not adhere to documented procedures, Qwest also failed to adhere in actuality to its documented processes. *Exhibit 2*, p. 49. Thus, if it was a problem for BellSouth in passing Section 271 muster, it likewise is a problem for Qwest.

KPMG also noted that Qwest's CR was flawed because (1) it was insufficiently clear and specific when initially issued and the required specification was provided to CLECs only four days before it was implemented, thereby giving CLECs inadequate time to prepare for the change, a flaw that likewise existed in BellSouth's change management process, *see id.*, p. 4; (2) Qwest did not respond to input from all interested parties, implementing the CR over CLEC objections; (3) Qwest failed to update the CR status on a timely basis; and (4) Qwest included rate changes even though the right and ability to do so is not explicitly within the scope of CMP. KPMG therefore refused to close this Exception. *Id.*

Qwest nonetheless suggests to KPMG, the ROC TAG, and this Commission that the dispute reflected in these Qwest CRs will be resolved in the CMP Redesign. For example, in its response to Observation 3066, *see Exhibit 9*, Qwest stated that it is negotiating with CLECs to establish "a process that will ensure that CLECs will have an opportunity to rank CLEC and Qwest submitted CRs." Yet, to Covad's knowledge, Qwest thus far has refused to permit CLECs to prioritize Qwest CRs. Indeed, Qwest's

conduct in issuing these CRs directly conflicts with Qwest's representation, since they were never "ranked" by CLECs, much less approved by them.

Covad does not seek resolution from the Commission on these specific disputes. Indeed, resolution of these disputes may more properly be resolved pursuant to either the CMP dispute resolution process or the dispute resolution provision contained in the Qwest-Covad IA. However, these disputes amply illustrate the need for a procedurally sound and adequate CMP not only for systems, but also for process and product in order to minimize, if not eliminate, Qwest's current ability to breach without impunity the SGAT or interconnection agreements. Had CLECs had substantial input into the design and continued operation of the CMP, this type of egregious conduct by Qwest never would have occurred.

There can be no argument that an ILEC's known and actualized, but uncorrected, ability to breach the SGAT or an IA via change management renders that CMP non-compliant with Section 271. Thus, these disputes reflect three Section 271-cognizable issues that still remain with respect to Qwest's CMP and which must be addressed through the development of sound and reasonable procedural safeguards for Qwest initiated product and process changes: (1) Qwest's use of CMP to promulgate policies and rates that are inconsistent with the SGAT and interconnection agreements; (2) Qwest's ability to implement any and all policies and charges it seeks to impose regardless of CLEC objection; and (3) Qwest's unwillingness to address or even respond to well-founded CLEC concerns. Unless and until the CMP has been redesigned to respond to these three points and Qwest has demonstrated that it will comply therewith,

Qwest cannot be found to be in compliance with its obligations under Section 271 of the Act.

B. Until Qwest Has Demonstrated a Pattern of Compliance with the Procedural Safeguards Contained in the Redesigned CMP, Qwest Cannot Be Found To Be in Compliance with Its Obligations Under Section 271.

Covad has reiterated repeatedly its position that Qwest must demonstrate compliance with the agreed upon redesigned system, product and process CMP before Qwest can be found to have satisfied its obligations under Section 271. Now that BellSouth has been compelled to withdraw its Georgia and Louisiana 271 applications, it is clear that FCC also requires a demonstration of compliance with the change control processes, since the BellSouth change control process – which the FCC pointedly identified as a concern in terms of the viability of BellSouth’s Section 271 applications – likewise was marked by an inability to adhere to documented procedures. *See Exhibit 2*, p. 68.

The examples set forth above regarding product and process abuses provide ample evidence that Qwest does not yet comply with its documented procedures for CMP and thus is not yet in Section 271 compliance. Additional evidence on this issue comes in the form of Qwest’s abuse of the processes relating to *systems* changes in order to advance its own objectives in disregard of those of the CLECs.

A highly contentious issue on which no resolution has yet been reached in the CMP redesign effort is the designation and prioritization of “regulatory CRs” – that is, changes to OSS interfaces mandated by federal or state commission rulings. *See SGAT*, Exhibit G, p. 6 (Types of Change I. Regulatory Change). At the end of October, Qwest issued to CLECs a list of CRs to be prioritized. Notably, nine of the CRs were listed as

regulatory CRs and thus bumped to the “head of the line” by Qwest for implementation. In other words, because Qwest said the CRs were regulatory, all other CLEC CRs were pushed down the prioritization list, thus ensuring that CLEC CRs would not be addressed until much later than the regulatory CRs.

As an initial matter, CLECs objected to “top” prioritization of regulatory CRs, and requested that CLECs be permitted to prioritize all CRs. Recognizing that regulatory CRs are mandatory and often have prescribed deadlines by which Qwest would have to implement changes, CLECs agreed to prioritize those CRs in a manner that would ensure that Qwest could meet the established “date certain.” Qwest refused that good faith offer.

Second, although CLECs requested that Qwest provide documentation supporting the designation of a CR as “regulatory,” Qwest provided only a docket or order reference. At no point was Qwest either willing to, or capable of, pointing to a specific paragraph, provision or sentence mandating the change that was the subject of each “regulatory” CR. Further, after extensive questioning by CLECs and others, it became evident that the use of the “regulatory” designation had little, if anything, to do with an actual state or federal order or even the definition of a regulatory CR contained in the Master Redlined Draft. To the contrary, the “regulatory” designation served as a useful tool to help Qwest game the CMP system. For example, the basis of one purported “regulatory” change is the *UNE Remand Order*. Since the *UNE Remand Order* was issued over two years ago in November 1999, it is simply not tenable for Qwest to now claim that a 2002 CR is a regulatory change mandated by that order. Qwest’s abuse of the “regulatory” designation, as well as its refusal to allow CLECs to prioritize all systems CRs,

demonstrates that Qwest is fundamentally unwilling to make the changes necessary for an effective change management process.

The disingenuousness Qwest demonstrated with its use of the “regulatory CR” designation is not limited to its dealing with CLECs. For example, in its response to Observation 3066, Qwest stated that it is in the process of negotiating with CLECs to allow them “to prioritize Regulatory and Industry Guideline CRs.” *See Exhibit 9*. To suggest that such negotiation is on-going, however, is not accurate at all, when Qwest (so far) has refused to allow regulatory CRs to be part of the prioritization process.

Abuse of the discretion injected into the CMP by Qwest is not the only example of why Qwest must demonstrate a pattern of compliance with the redesigned CMP. One of the more easily resolved issues that was posed to the CMP redesign team was to establish a method by which Qwest would provide timely and adequate notification to CLECs.⁸ Yet, even though the parties had agreed upon an interim process regarding notice of pending changes, Qwest apparently refuses to live up to its agreements. More specifically, as recently as December 8, 2001, Qwest issued two “event notifications” that proved useless since one notification had nothing attached to it, while the other was sent out after an identified IMA outage already had occurred. Attached hereto as *Exhibit 10* is an email communication from Eschelon to Qwest regarding the untimeliness of such notifications.

Qwest plainly is unable to provide adequate, accurate and timely notification of changes to products, process and systems, nor is it willing to incorporate and adhere to procedurally adequate, sound and fair procedures by which to consider and implement

⁸ This issue is reflected in the Change Management COIL as CM 17.

changes to product, process and systems. Qwest cannot be found to be in compliance with its Section 271 obligations relating to change management until the CMP redesign for systems, at a minimum, has been completed, and Qwest's ability to adhere thereto has been evaluated favorably by an independent third party.

The imposition of a requirement that Qwest demonstrate adherence to the "redesigned" CMP is fully consistent with the representations Qwest made in order to get CLECs to agree to take CMP out of the Section 271 workshops and into the redesign process. More specifically, during a July 31, 2001 pre-hearing conference in the State of Washington, Qwest represented that it anticipated that the ROC third party tester would review the redesigned CMP processes and procedures as part of the OSS testing. *See Exhibit 3*, p. 05349 and 05388. Qwest also anticipated bringing the final CMP documents back to the Commission for review and comments/briefing by the parties. *Id.* In other words, Qwest represented that it would complete the redesign process, have that redesigned process evaluated by KPMG, and then would subject the final package to CLEC and Commission review. *Id.* Based on Qwest's own representations upon which CLECs relied, therefore, until the redesign process for systems, at a minimum, is completed and then reviewed by KPMG and briefed by the parties, this Commission can neither determine whether CLECs actually did have substantial input into the redesign and continued operation of the CMP, nor make a recommendation regarding Qwest's compliance with Section 271 of the Act.

C. Even Focusing Just On The CMP Redesign for Systems, The CMP Is Not Yet Section 271 Compliant.

1. The CMP Lacks A Procedure for Timely and Fair Resolution of CMP Disputes.

While Covad recognizes that Qwest owns the local network in its incumbent region, and appropriately may make changes to that network, such right and ability must

be constrained to ensure that changes are made in procedurally fair and timely manner. As currently postured, however, the CMP does not accord equal treatment to CLECs and Qwest -- thus eliminating parity of treatment in the consideration and implementation of systems changes, and in no way provides a procedure for timely resolution of disputes flowing from Qwest CRs.

For example, the CLEC-Qwest OSS interface CR process grants Qwest the right to accept or reject a CLEC CR, and upon rejection, the CLEC either must escalate and then engage in dispute resolution. At the same time, however, no CLEC can cause the denial or rejection of a Qwest CR. While Covad does not object to the process for dealing with rejected or denied CRs *per se*, it does object to the process being one-sided and unfair. In other words, CLECs should have a comparable and equal ability to reject a Qwest-initiated CR that is CLEC affecting, and then Qwest should bear the burden of taking to dispute resolution its CR. The process of CLEC and Qwest CRs thus will be the same -- or at parity -- regardless of which party initiates a systems CR. In the absence of parity of process, there is no procedure -- adequate or not -- for the timely resolution of change management disputes -- including disputes relating to Qwest CRs. Qwest therefore cannot be deemed in compliance with the statutory conditions for entry, particularly when concerns regarding BellSouth's refusal to allow CLECs to prioritize all CLEC impacting CRs were noted by the FCC as a deficiency in BellSouth's Section 271 application. *Exhibit 2*, p. 55.

2. Even Focusing Just On The CMP Redesign For Systems, There Is Still An Enormous Amount of Work Yet To Be Done Before the CMP May Be Deemed Section 271 Compliant.

Qwest suggests that, even as it currently stands, it has a Section 271-compliant CMP in place. The significant number of issues still facing the CMP redesign team, however, shows that CLECs have not yet had sufficient input into the design and

continued operation of the CMP. The most recently revised Redesign Issues List, attached hereto as *Exhibit 11*, is twenty pages long, and includes numerous systems issues, such as:

- (1) the description and process for proprietary CRs and proprietary CLEC questions and comments;
- (2) the process for handling “draft” industry guideline changes;
- (3) the process to ensure that retail changes which are CLEC impacting are noticed via the CMP;
- (4) the definition of terms;
- (5) the resolution of CMP SGAT language;
- (6) the criteria for denial of CLEC CRs;
- (7) the development of language and an exception process for CRs;
- (8) a decision on the scope/limit on number of major non-IMA OSS releases;
- (9) the need for, and prioritization of, CRs;
- (10) resolution of the issue of whether prioritization is on a per-OSS basis;
- (11) the categorization of CRs with cross-functional impacts;
- (12) the scope of CRs Qwest will consider (i.e., CPAP changes, PID changes) in the CMP;
- (13) the process for addressing and implementing Qwest CRs; and
- (14) Qwest’s required level of effort with respect to CLEC CRs.

Each of these issues is material to the development of a procedurally adequate CMP for systems changes, and must be resolved and implemented before Qwest can present to this Commission its CMP for approval. For instance, there are numerous CRs that Qwest has identified that have both process and systems impacts (*see #11*).⁹ Yet, no

⁹ Process CR 5582295 and Systems CR SCR092601-1; Process CR 5579345 and Systems CR SCR112101-2; Process CR PC 083001-1 and Systems CR SCR101901-1; Process CR PC100401 and Systems CR SCR112101-1.

discussion or agreement has yet occurred as to how cross-functional CRs will be treated within the CMP, which obviously will have a significant impact as far as the rights and obligations of the parties in reviewing and implementing that CR. Consequently, until issues like this are fully resolved, Qwest cannot be found to have a CMP that complies with the obligations imposed under Section 271 of the Act. Additionally, attached hereto as *Exhibits 12 through 15* are the analyses provided by AT&T, Covad, Eschelon and WCom regarding the gaps that still exist in the CMP, the CMP redesign process, and CMP documentation.

Further evidence that the CMP is not yet Section 271 compliant comes from the KPMG audit of Qwest's CMP. More specifically, in Exception 3093, attached hereto as *Exhibit 16*, KPMG stated that "Qwest lacks uniform standards and processes for document management" and that the CMP "does not include established processes to ensure that documents distributed to CLECs have uniform standards, and that a process for maintaining and updating documentation is in place." KPMG therefore concluded that the "lack of documentation management standards and processes may create difficulties for CLECs," including (1) being "unable to schedule training, prepare systems, understand when changes go into effect, and comply with Qwest practices"; and (2) "[t]ime consuming and labor-intensive process for CLECs to [identify and apply and] manage change." *Id.* As KPMG acknowledged, the ultimate impact on CLECs is a "negative impact on CLEC business operations and profitability."

Qwest did not dispute KPMG's findings at all. Rather, Qwest stated that the issues identified by KPMG would be addressed in the CMP redesign effort and that appropriate changes would be communicated to CLECs no later than January 31, 2002. *Id.* Notably, however, Qwest's processes for document management pertained only to PCAT and technical publication changes and not to all operational documents that impact CLEC operations and profitability. Thus, as KPMG realized, following the January 31, 2002 date, additional retesting will be required to determine whether Qwest

has implemented adequate change control mechanisms in the CMP. *Id.*

Qwest's current inability to manage change control is documented in numerous other Observations and Exceptions issued by KPMG. For example, in Observation 3066, KPMG determined that Qwest does not consistently employ the defined change management processes to exclude CLEC-affecting changes from IMA point releases.¹⁰ *See Exhibit 9.* Specifically, Qwest included an entirely new system change (appointment scheduler) in a point release, even though such changes should be included only in a "dot 0" releases. When Qwest did move that change to the full release, Qwest did so without putting the change through the prioritization process.

Even more troubling, KPMG found in Observation 3066 that Qwest did not have a clearly defined and documented procedure for identifying when a change is CLEC-affecting. Consequently, Qwest's inconsistent application of its own supposed CMP procedures, in tandem with the lack of a definition of CLEC-affecting, "makes it difficult for CLECs to prepare for and respond to Qwest point releases. This exposes CLECs to unnecessary risks from changes that could impact their business operations and service to end-use customers." *Id.*

While Qwest attempted to side-step the issue, stating that this issue was being handled through CMP Redesign – although it would not be implemented until *June 2002* – Qwest's response made clear that all of the issues identified by KPMG are still the subject of on-going discussion in the CMP redesign and no agreement had yet been reached. *Id.* KPMG was not satisfied with Qwest's reply, and thus refused to close the observation as of January 6, 2002.

Similarly, in Observation 3067, *see Exhibit 17*, KPMG found that the CMP "lacks guidelines for prioritizing and implementing CLEC-initiated CRs." Despite Qwest's

¹⁰ The "dot 0" IMA releases (i.e., 10.0) are "major" releases and include CLEC-affecting changes. By contrast, the IMA "version" releases – the point releases (i.e., 10.1) – are not major releases and should not, by definition, include any CLEC-affecting changes.

reference again to CMP redesign and the Master Redline CLEC-Qwest CMP Redesign Framework, KPMG's concerns regarding the lack of guidelines for these critical issues remained unallayed and KPMG therefore recommended that Observation 3067 remain open.

This is not the end of the problems identified in connection with Qwest's systems CMP. KPMG also identified the fact that Qwest had not yet provided to KPMG sufficient information to demonstrate that it has documented contingency plans and/or processes to correct failures in the production version(s) of OSS interfaces. *See* Observation 3052, attached hereto as *Exhibit 18*. Although Qwest claimed in its first, second and third formal response to have such plans in place, KPMG dismissed this contention summarily, finding that Qwest had failed to provide sufficiently complete or specific documentation. KPMG concluded that Qwest only had "fragments of a production support framework [that] do[es] not constitute a comprehensive process" *Id.* While Qwest continued to provide information to support its claim of a complete and documented OSS contingency plan for production support, KPMG has not yet seen fit to agree with the contention. Notably, it was precisely because of issues like incomplete and ambiguous documentation that the FCC had concerns regarding BellSouth's change management process, which contributed, in part, to the withdrawal of those applications. *See Exhibit 2*, p. 51.

The pseudo-CLEC in the ROC OSS testing, Hewlett Packard, likewise has found flaws in Qwest's CMP process. In Exception 2003 (which appears to have been opened in early to mid 2001), HP determined that Qwest does not follow its established release notification schedule when implementing IMA releases. *See* HP Summary of Exception 2003 to the ROC TAG, attached hereto as *Exhibit 19*. Tellingly, after several months of

working on this Exception, HP remained unable to close it as of January 11, 2002 due to the fact that three of the four issues identified by HP supposedly would be resolved by language Qwest will propose and/or discuss at the January 22-24, 2002 CMP redesign meeting. *Id.* In other words, several key issues identified by HP have yet to be discussed and resolved (either to consensus or impasse) at this point in time. Further, HP stated that Exception 2003 should not be closed until it could retest the process designed and agreed upon by the CMP redesign team. *Id.*

III. CONCLUSION

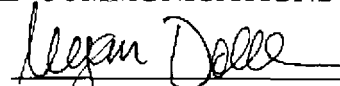
For the reasons set forth more fully above, the Commission should find that Qwest has not yet developed, implemented and demonstrated compliance with a Section 271 sufficient change management process. Qwest's application for Section 271 relief in this State cannot be approved at this time.

Dated this 18th day of January, 2002.

Respectfully submitted,

COVAD COMMUNICATIONS COMPANY

By:



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CERTIFICATE OF SERVICE

I, Todd C. Wiley, Esq., hereby certify that an original and ten (10) copies of the Covad Communications Company's Brief on Qwest Corporation's Change Management Process, Docket No. T-00000A-97-0238, were filed on this 18th day of January, 2002, to the following:

Arizona Corporation Commission
Docket Control-Utilities Division
1200 West Washington Street
Phoenix, AZ 85007-2996

and a true and correct copy of Covad Communications Company's Brief on the Liberty Data Reconciliation Report was served via hand delivery and overnight delivery this 18th day of January, 2002, on the following:

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Phoenix, AZ 85007

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and a true and correct copy of Covad Communications Company's Brief on Qwest Corporation's Change Management Process was sent via electronic mail; on this 18th day of January, 2002, to the following:

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EXHIBIT 1



NEWS

Federal Communications Commission
445 12th Street, S.W.
Washington, D. C. 20554

News media Information 202 / 418-0500
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TTY 202/418-2555
Internet: <http://www.fcc.gov>
<ftp.fcc.gov>

This is an unofficial announcement of Commission action. Release of the full text of a Commission order constitutes official action. See MCI v. FCC, 515 F.2d 385 (D.C. Cir. 1974).

FOR IMMEDIATE RELEASE
December 20, 2001

Contact: David Fiske
(202) 418-0513

STATEMENT OF FCC CHAIRMAN MICHAEL POWELL ON WITHDRAWAL OF BELL SOUTH 271 APPLICATION

BellSouth has withdrawn its application to provide long distance service in Georgia and Louisiana. The FCC cannot approve such applications by the Bell Companies unless they satisfy the requirements of section 271 of the Communications Act.

BellSouth's application demonstrated the company's commitment and ability to make significant progress toward satisfying the statutory requirements and our precedents. Moreover, this application evidences significant and critical work by the Georgia and Louisiana state utility commissions.

Yet, despite extensive conversation and collaboration with the FCC, questions remain regarding whether BellSouth has satisfied the rigorous requirements of the statute and our precedents, including the adequacy of the company's operational support systems, the integrity of its performance data and its change management process and related issues.

We look forward to working with the company and with the Georgia and Louisiana utility commissions to provide them with any additional guidance they need to understand and satisfy the demanding requirements in this area.

- FCC -

EXHIBIT 2

Exception

Florida BellSouth OSS Test Evaluation Status

KPMG Co

Status and

Date of First Issued ID Test and

Closure/Resolution

Call # Domain

Closed

1

PPRS

Statement

Issue

10-Aug-00

BellSouth's electronic data interchange (EDI) test environment is inadequate for testing of a CLEC's EDI interface. The EDI test environment does not allow a CLEC to fully test Local Number Portability (LNP) without the use of live customers.

No further action is required.

Date External Activity Summary

7/26/2000 Issued to FPSC/BellSouth

7/31/2000 Received statement of investigation from BellSouth

8/3/2000 Received BellSouth response, forwarded to KPMG Consulting for Review

8/10/2000 Exception call: KPMG Consulting indicated that the proper controls and processes must be in place to ensure live customers were not affected. BellSouth will review the issue raised and respond

8/17/2000 Exception call: KPMG Consulting will re-evaluate data, scripts and documents supplied by BellSouth.

8/24/2000 Exception call: KPMG Consulting is reviewing the exception based on concerns and issues raised by BellSouth.

9/14/2000 Exception call: KPMG Consulting indicated they had sent a clarifying question to BellSouth that would be discussed next week once BellSouth had an opportunity to review.

9/28/2000 Exception call: KPMG Consulting indicated that they reviewed the business rules and have been able to complete some of the outstanding fields, BellSouth has indicated that they will provide the remaining data.

10/2/2000 Received BellSouth's amended response, forwarded to KPMG Consulting for review.

10/5/2000 Exception call: KPMG Consulting has used the test cases provided by BellSouth and they work. KPMG Consulting will prepare a disposition report.

10/31/2000 Issued disposition report.

11/9/2000 Exception closed, no further action required.

Closed

2

PPRS

Inconsistencies and omissions in the BellSouth EDI Specifications Guide (EDI Specifications) and the

No further action is required.

17-Aug-00

Relationship Management Rules) prevent the development of an EDI interface between BellSouth and a CLEC.

Date External Activity Summary

8/2/2000 Issued to FPSC and BellSouth

Friday, January 04, 2002

Exception

KPMG Consulting, Inc.

Page 1 of 70

Status and Date of First Issued ID		Test and Test and Domain	Closure/Resolution Issue
Call	#	Statement	
1/2/2001		Issued amendment to FPSC and BellSouth.	
1/30/2001		Received 6th amended response from BellSouth, KPMG Consulting to review.	
2/8/2001		Exception call: KPMG Consulting clarified with BellSouth which documents it should include in their analysis of the exception.	
2/22/2001		Exception call: KPMG Consulting indicated that there are still several issues from the original exception that need to be addressed.	
3/12/2001		Received BellSouth documentation relating to the exception, KPMG Consulting to review.	
3/29/2001		Exception Call: KPMG Consulting to send data regarding issues with new documentation to BellSouth	
3/29/2001		KPMG Consulting sent data regarding modified documentation to BellSouth and FPSC.	
4/5/2001		Exception Call: Reviewed information discussed on clarification call regarding modifications to proprietary data.	
4/23/2001		Received modified data for amended response for BellSouth.	
4/30/2001		Received modified date for exception response of 5/3/01.	
5/3/2001		Received BellSouth amended response.	
5/10/2001		Exception Call: Pending updated documentation on adequacy of documentation, other areas have been satisfied. Clarification call on 5/14 to discuss proprietary information.	
5/14/2001		Clarification Call: discussed remaining issued with Appendix E.	
5/14/2001		Sent BellSouth update on pending response.	
5/16/2001		Received BellSouth updated documentation for exception 4.	
6/7/2001		Exception Call: BellSouth provided KPMG Consulting with modified documentation which addressed all issues. KPMG Consulting is satisfied that Exception has been resolved.	
7/17/2001		Issued disposition statement to FPSC and BellSouth.	
7/19/2001		Exception Call: KPMG Consulting is satisfied that all issues have been resolved.	
Closed	5	PPR1	No further action is required.
31-Aug-00		Relationship Manage	
Date	External Activity Summary		
8/17/2000	Issued to FPSC and BellSouth.		
8/22/2000	Received BellSouth's statement of investigation.		
Friday, January 04, 2002		Exception	KPMG Consulting, Inc.

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<i>Status and Date of First Issued</i>		<i>ID</i>	<i>Test and</i>	<i>Statement</i>		<i>Closure/Resolution</i>
<i>Call</i>	<i>#</i>	<i>Domain</i>				<i>Issue</i>
3/22/2001	Exception Call:	KPMG Consulting	BellSouth	<p>Issued 2nd Amended Exception 11 to FPSC and BellSouth.</p> <p>Received BellSouth response to exception and supporting documentation.</p> <p>Sent clarification questions to BellSouth.</p> <p>Received exception clarification response to Exception 11.</p> <p>Sent data request for May 2001 data to BellSouth.</p> <p>BellSouth sent May data to KPMG Consulting.</p> <p>Received replacement May data from BellSouth.</p> <p>Send Clarification question to BellSouth.</p> <p>BellSouth provided clarification response.</p> <p>Exception Call: KPMG Consulting successfully completed replication for May 2001 data.</p> <p>Open 12 PPR1</p> <p>Relationship Management Outages (Type 1) established in the BellSouth Change</p> <p>Exception Call: KPMG Consulting reviewed response and is continuing with re-testing. Re-test will be extended to increase sample size.</p>		
3/29/2001	Exception Call:	KPMG Consulting	BellSouth			
4/16/2001	Exception Call:	KPMG Consulting	BellSouth			
5/7/2001	Exception Call:	KPMG Consulting	BellSouth			
5/18/2001	Exception Call:	KPMG Consulting	BellSouth			
5/23/2001	Exception Call:	KPMG Consulting	BellSouth			
6/19/2001	Exception Call:	KPMG Consulting	BellSouth			
6/29/2001	Exception Call:	KPMG Consulting	BellSouth			
7/17/2001	Exception Call:	KPMG Consulting	BellSouth			
7/23/2001	Exception Call:	KPMG Consulting	BellSouth			
8/2/2001	Exception Call:	KPMG Consulting	BellSouth			
8/23/2001	Exception Call:	KPMG Consulting	BellSouth			
9/13/2001	Exception Call:	KPMG Consulting	BellSouth			
22-Feb-01	Exception Call:	KPMG Consulting	BellSouth			
2/14/2001	Exception Call:	KPMG Consulting	BellSouth			
2/22/2001	Exception Call:	KPMG Consulting	BellSouth			
2/22/2001	Exception Call:	KPMG Consulting	BellSouth			
3/8/2001	Exception Call:	KPMG Consulting	BellSouth			
3/22/2001	Exception Call:	KPMG Consulting	BellSouth			
4/2/2001	Exception Call:	KPMG Consulting	BellSouth			
4/12/2001	Exception Call:	KPMG Consulting	BellSouth			
Friday, January 04, 2002	Exception Call:	KPMG Consulting	BellSouth			

Status and Date of First Issued ID		Test and Test and Domain	Closure/Resolution Issue	
Call	#	Statement		
3/6/2001		Issued to FPSC and BellSouth.		
3/12/2001		Received BellSouth response, KPMG Consulting to review.		
3/15/2001		Exception call: KPMG Consulting introduced the exception.		
3/22/2001		Exception Call: KPMG will re-evaluate based on changed to Business Rules.		
4/5/2001		Exception Call: KPMG Consulting evaluated new documentation and is satisfied that documentation has been updated to reflect ordering Migration of retail customers using an EEL. Moving to disposition.		
5/23/2001		Issued disposition to FPSC and BellSouth.		
5/24/2001		Exception Call: KPMG Consulting is satisfied that issued has been met - discussed disposition of exception.		
Closed	18	PPR16 The BellSouth Network Reliability Center (NRC) fails to provide proactive notification to CLECs on Network/Switch outages affecting their end users.	No further action is required.	
22-Mar-01		Repair, Provisioning		
Date		External Activity Summary		
3/12/2001		Issued to FPSC and BellSouth.		
3/15/2001		Exception call: KPMG Consulting introduced the exception.		
3/16/2001		Received BellSouth response, KPMG Consulting to review.		
3/29/2001		Exception Call: Based on the BellSouth response, KPMG Consulting is satisfied that a process is in place for CLEC notification.		
4/19/2001		Exception Call: Discussed Disposition of Exception 18.		
Withdrawn	19	TVV1 BellSouth's Network Services Customer Services does not provide consistent access to Customer Support Manager (CSM) during high-volume for Competitive Local Order Management Exchange Carriers (CLEC) calls.	Withdrawn by KPMG Consulting.	
15-Mar-01				
Date		External Activity Summary		
3/12/2001		Issued to FPSC and BellSouth.		
3/15/2001		Exception call: KPMG Consulting introduced the exception.		
3/16/2001		Received BellSouth response, KPMG Consulting to review.		
3/22/2001		Exception Call: KPMG Consulting withdrew exception based on lack of sample size.		

Friday, January 04, 2002

Exception

KPMG Consulting, Inc.

<i>Status and Date of First Issued ID</i>	<i>Test and Test and Domain</i>	<i>Statement</i>	<i>Closure/Resolution Issue</i>
<i>Call #</i>			
9/19/2001	KPMG Consulting responded to clarification questions from BellSouth.		
9/19/2001	KPMG Consulting responded to clarification questions from BellSouth.		
9/26/2001	BellSouth provided new target for response of 10/5.		
10/2/2001	Received BellSouth response to 3rd Amended Exception 22 with supporting documentation.		
11/7/2001	KPMG Consulting is attempting to replicate, asked BellSouth clarifying questions.		
11/26/2001	KPMG Consulting is retesting issues associated with this Exception and awaiting the release of RDUN version 2.1.11.		
Closed	23 PPR1 The distribution of Carrier Notification information associated with the BellSouth Change Control Process is not adequate. Furthermore, in BellSouth's Relationship Management implementation of the process, significant information is not included in the Carrier Notifications.	No further action is required.	
21-Mar-01			
<i>Date</i>	<i>External Activity Summary</i>		
3/12/2001	Issued to FPSC and BellSouth. This exception was observation 21.		
3/19/2001	Received BellSouth response, KPMG Consulting to review.		
3/22/2001	Exception call: Introduced exception.		
6/19/2001	Provided BellSouth with data requested.		
7/2/2001	Received BellSouth amended response to Exception.		
7/19/2001	Exception Call: KPMG Consulting is satisfied that all issues have been resolved.		
7/30/2001	Issued Disposition Report to FPSC and BellSouth.		
8/2/2001	Exception Call: KPMG Consulting with the concurrence of the FPSC feels that all issues have been satisfied with this exception.		
Closed	24 PMRS KPMG Consulting cannot replicate the values in the "Provisioning: Local Number Portability (LNP) - Total Service Order Cycle Time" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2000). KPMG Consulting found that BellSouth's instructions are insufficient for calculating the metrics values for this	No further action is required.	
21-Mar-01			
<i>Date</i>	<i>External Activity Summary</i>		
3/12/2001	Issued to FPSC and BellSouth. This exception was observation 25.		
3/14/2001	During the observation call for observation 25: KPMG Consulting indicated that the BellSouth's response did not address the issue, BellSouth is reviewing the issue.		
<i>Friday, January 04, 2002</i>	Exception	KPMG Consulting, Inc.	<i>Page 18 of 70</i>

**Status and Test and
Date of First Issued ID Test and**

Closure/Resolution

Call #	Statement	Issue	
8/3/2001	Received BellSouth response to exception.		
8/6/2001	KPMG Consulting requested MARCH information for 3 TNs from BellSouth.		
8/14/2001	Received BellSouth Response to exception.		
8/22/2001	Received word from BellSouth that MARCH history is not available.		
8/30/2001	Exception Call: 3 TNs Not Sat based on testing, pending updates to LSOG.		
10/30/2001	Clarification Call: Held call with BellSouth to continue to further clarify issues regarding this Exception.		
Open	77 TVV1	KPMG Consulting reviewing clarification information provided by BellSouth.	
05-Jul-01	Order Management with Number Portability service requests via the Telecommunications Access Gateway (TAG), (TVV1)		
Date	External Activity Summary		
6/28/2001	Issued to FPSC and BellSouth		
7/3/2001	Received BellSouth Statement of Investigation.		
7/5/2001	Exception Call: Introduced exception.		
7/10/2001	Received BellSouth response to Exception.		
7/19/2001	Exception Call: BellSouth to implement systems fix on 7/28/01.		
8/30/2001	Exception Call: KPMG Consulting continues to receive error messages. BellSouth confirmed that fix was implemented on 7/28. KPMG Consulting to provide data to BellSouth to investigate.		
9/20/2001	Send clarification questions to BellSouth regarding exception.		
10/2/2001	BellSouth sent clarification information regarding Exception 77.		
10/24/2001	Exception Call: KPMG Consulting requested a target response date for BellSouth's answers to clarifying questions.		
Closed	78 PMR3	No further action is required.	
05-Jul-01	Metrics		
Date	External Activity Summary		
6/28/2001	Issued to FPSC and BellSouth		

Friday, January 04, 2002

Exception

KPMG Consulting, Inc.

<i>Status and Date of First Issued ID</i>		<i>Test and Test and Domain</i>		<i>Closure/Resolution Issue</i>
<i>Call</i>	<i>#</i>	<i>Statement</i>		
7/5/2001		Received BellSouth Statement of Investigation.		
7/12/2001		Exception Call: Introduced exception.		
7/20/2001		Received BellSouth response to exception.		
7/26/2001		Exception Call: BellSouth does not offer and does not plan to offer DS1 inside moves in the near future.		
9/13/2001		Exception Call: BellSouth updated business rules, KPMG Consulting is satisfied that issues have been resolved.		
11/1/2001		KPMG Consulting forwarded the Disposition Report to the FPSC.		
12/12/2001		With the concurrence of the FPSC, KPMG Consulting closes Exception 80.		
Closed	81	PMFR2	KPMG Consulting has found that BellSouth's stated Business Rules in the Florida Interim Performance Metrics document for the "Change Management: Notification of CLEC Interface Outages Service Quality Measurement (SQM)" are ambiguous.	KPMG Consulting reviewing response.
18-Jul-01				
<i>Date External Activity Summary</i>				
7/10/2001		Issued exception to FPSC and BellSouth.		
7/13/2001		Received BellSouth Statement of Investigation.		
7/18/2001		Received BellSouth response to exception and supporting documentation.		
7/19/2001		Exception Call: Introduced exception.		
7/30/2001		Received BellSouth Amended Response and Red lined SQM for exception.		
8/10/2001		Issued Amended Exception to FPSC and BellSouth.		
8/16/2001		Exception Call: KPMG Consulting feels that ambiguities must still be addressed, issued amended exception to address.		
8/20/2001		Received BellSouth response with support documentation.		
8/29/2001		Send clarifying questions to BellSouth.		
8/30/2001		Exception Call: KPMG discussed clarifying questions sent to BellSouth.		
9/7/2001		Received BellSouth response to clarification questions.		
9/18/2001		Had clarification call re Exception 81, BellSouth to amend response.		
<i>Friday, January 04, 2002</i>		Exception	KPMG Consulting, Inc.	<i>Page 51 of 70</i>

Status and Date of First Issued ID		Test and Test and Domain		Closure/Resolution
Call	#	Statement		Issue
9/28/2001		KPMG Consulting provided BellSouth with IS Log of Backend resource limitations.		
Open	88	PPR1	The BellSouth Change Control Prioritization Process does not allow CLECs to prioritize all Change Requests that effect CLEC business Manage	Exception to remain open.
Date	External Activity Summary			
7/20/2001	Issued to FPSC and BellSouth as Exception 88 and to Public as Exception 88 Redacted.			
7/25/2001	Received BellSouth response and Redacted response.			
7/26/2001	Exception Call: Introduced exception.			
7/31/2001	Issued Non-Redacted Exception 88 and BellSouth response to publish on FPSC website.			
8/2/2001	Exception Call: BellSouth did not address all issues in exception- KPMG Consulting expectation is that CLECs can perform impact assessment - awaiting addition info or amended response from BellSouth.			
8/16/2001	Exception Call: KPMG Consulting to continue to monitor and work through ECS helpdesk on issues.			
8/23/2001	Exception Call: Exception to remain open, KPMG Consulting to continue to monitor.			
12/13/2001	KPMG Consulting will be amending this exception.			
Open	89	TVV1	BellSouth's Local Exchange Navigation System (LENS) 9.2 is inconsistent with the BellSouth Business Rules for Order Management Local Ordering, OSS99, issue 9M.	Clarification call to be arranged.
Date	External Activity Summary			
7/20/2001	Issued to FPSC and BellSouth.			
7/26/2001	Exception Call: Introduced exception.			
7/26/2001	Received BellSouth response to exception.			
8/2/2001	Exception Call: KPMG Consulting verifying BellSouth response based on remarks field.			
8/28/2001	BellSouth provided answers to clarifying questions.			
9/27/2001	Exception Call: Both sides to investigate further.			
11/7/2001	KPMG Consulting has concluded its retesting efforts and agrees with the BellSouth response. Will recommend closure to the FPSC.			

Friday, January 04, 2002

Exception

KPMG Consulting, Inc.

<i>Status and Date of First Issued ID</i>		<i>Test and Domain</i>	<i>Statement</i>	<i>Closure/Resolution Issue</i>
<i>Call</i>	<i>#</i>			
Open	116	TVV2	BellSouth representatives did not provide expected responses to Local Service Requests (LSRs) submitted by KPMG Consulting via facsimile (fax). (TVV2)	
08-Nov-01		Order Management		
<i>Date</i>		<i>External Activity Summary</i>		
11/2/2001		Received BellSouth's Statement of Investigation.		
11/7/2001		Exception Call: Exception is introduced.		
11/9/2001		Received BellSouth response to Exception 116.		
12/24/2001		KPMG Consulting released Amended Exception 116.		
Open	117	TVV1	KPMG Consulting has not received manual Firm Order Confirmations (FOC) on orders that have been assigned a Completed (CP) or Pending (PD) Status in BellSouth's Management Customer Service Order Tracking System (CSOTS).	
08-Nov-01		Order Management		
<i>Date</i>		<i>External Activity Summary</i>		
11/2/2001		Statement of Investigation received from BellSouth		
11/8/2001		Exception Call: Exception 117 introduced.		
11/12/2001		Received BellSouth's response to Exception 117.		
Open	118	TVV2	KPMG Consulting has received invalid responses for pre-order queries submitted via the Telecommunications Access Gateway (TAG) interface. (TVV2)	
14-Nov-01		Order Management		
<i>Date</i>		<i>External Activity Summary</i>		
11/15/2001		Exception Call - introduced.		
12/6/2001		Received BellSouth response to Exception 118		
12/12/2001		Released Amended Exception 118		
12/17/2001		Received BellSouth response to Amended Exception 118		
Open	119	PMR3	KPMG Consulting has discovered that BellSouth is not adhering to the documented metrics change control process for tracking changes in TeamConnection. (PMR3)	
14-Nov-01		Metric		
<i>Date</i>		<i>External Activity Summary</i>		
11/15/2001		Exception Call - introduced.		

Friday, January 04, 2002

Exception

KPMG Consulting, Inc.

EXHIBIT 3

05333

1 BEFORE THE WASHINGTON UTILITIES AND
2 TRANSPORTATION COMMISSION

3

4 In the Matter of the) Docket No. UT-003022
 Investigation Into US WEST) Volume XXXVI
5 Communications, Inc.'s) Pages 5333-5502
 Compliance with Section 271 of)
6 the Telecommunications Act of)
 1996.)
7 _____)
 In the Matter of US WEST) Docket No. UT-003040
8 Communications, Inc.'s)
 Statement of Generally)
9 Available Terms Pursuant to)
 Section 252(f) of the)
10 Telecommunications Act of 1996.)
 _____)

11

12 A workshop in the above matter was
13 held on July 31, 2001, at 10:11 a.m., at 900 Fourth
14 Avenue, Suite 2400, Seattle, Washington, before
15 Administrative Law Judge ANN RENDAHL.

16

17 The parties were present as
18 follows:

19 AT&T, by Rebecca DeCook, Steven
 Weigler, Sarah Kilgore, and Letty S.D. Friesen (via
 teleconference bridge), Attorneys at Law, 1875
20 Lawrence Street, Suite 1575, Denver, Colorado, 80202.

21 QWEST, by Lisa Anderl, Attorney at
 Law, 1600 Seventh Avenue, Room 3206, Seattle,
22 Washington, 98191, Andrew Crain and Charles W. Steese
 (via teleconference bridge), Attorneys at Law, 1801
23 California Street, 49th Floor, Denver, Colorado,
 80202, and Kara Sacilotto (via teleconference
24 bridge), Attorney at Law, Perkins Coie, LLP, 607 14th
 Street, N.W., Washington, D.C. 20005.
25 Barbara L. Nelson, CCR
 Court Reporter

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1 WORLDCOM, by Ann Hopfenbeck,
2 Attorney at Law, 707 17th Street, Suite 3600, Denver,
3 Colorado, 80202.

4 XO WASHINGTON, INC., and ELI, by
5 Gregory J. Kopta, Attorney at Law, Davis, Wright,
6 Tremaine, LLP, 2600 Century Square, 1501 Fourth
7 Avenue, Seattle, Washington, 98101.

8 WAISP and YIPES, by Richard J.
9 Busch, Attorney at Law, Miller Nash, 4400 Two Union
10 Square, 601 Union Street, Seattle, Washington, 98101.

11 SPRINT, by Barb Young, Group
12 Regulatory Manager, 902 Wasco Street, Hood River,
13 Oregon 97031.

14 PUBLIC COUNSEL, by Robert
15 Cromwell, Assistant Attorney General, 900 Fourth
16 Avenue, Suite 2000, Seattle, Washington, 98164.

17 COVAD, by Megan Doberneck,
18 Attorney at Law, 7901 Lowry Boulevard, Denver,
19 Colorado 80230.

20 TRACER, by Arthur A. Butler (via
21 teleconference bridge), Attorney at Law, Ater Wynne,
22 601 Union Street, Suite 5450, Seattle, Washington
23 98101.

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05340

1 of US West as a result of this proceeding. Moreover,
2 there is no requirement for the Commission to hold a
3 hearing before coming to any conclusion regarding its
4 recommendation to the FCC.

5 The fact that the ordinary rules of civil
6 procedure apply don't mean that Qwest is suggesting
7 that we don't have processes to review the issues in
8 this docket. I think we've already gone through a
9 process in these workshops that has developed a much
10 more complete record than has been developed in any
11 other 271 proceeding across the country.

12 We also think that the Commission ought to
13 have proceedings to review the remaining issues in
14 the case, but we're making the statement about the
15 ordinary rules of civil procedure because the
16 Commission has the ability in this case to think
17 creatively and to fashion whatever proceedings it
18 decides to have to the facts at hand. It doesn't
19 need to follow traditional rules of you file
20 testimony, this happens, this happens.

21 That being said, there are, I believe, four
22 issues remaining to be decided in this case, or to be
23 considered. The first issue is change management,
24 which is something that came up in the last general
25 terms and conditions workshop. The way the change

05341

1 management process worked is it was part of general
2 terms and conditions, because it's referred to in
3 Section 12 of the SGAT, which relates to OSS.

4 We have a change management process and
5 have had one that has been operating for a couple of
6 years now, and based our testimony upon that process.
7 The CLECs then filed responsive testimony with
8 numerous suggestions in terms of how we can improve
9 that process. I sat down with our change management
10 people and we went through the testimony and I said,
11 Well, can we do this, and they said yes; can we do
12 that, and they said yes.

13 But the problem was that we got to the
14 point where we realized that while we're willing to
15 make a lot of concessions there and work to meet the
16 CLECs' needs, we can't work in the workshop to do
17 that. We can't actually make agreements in these
18 workshops in terms -- about how CICMP should be
19 handled, because -- CICMP is our name for change
20 management -- because the change management process
21 itself needs to make those decisions, and all of the
22 CLECs participating in the change management process
23 need to be part of those discussions.

24 As a result, we have taken those
25 discussions and made a proposal to the change

05342

1 management process, the change management body, about
2 how to revamp the change management process, and we
3 have started engaging in negotiations with the CLECs
4 regarding how to change our change management
5 process, and we're meeting with them for two days
6 every other week, and then we might have some side
7 calls, as well, but a lot of work is being done. I
8 anticipate that we will be able to satisfy The CLECs'
9 needs in those discussions.

10 My suggestion about how to handle the
11 remaining change management issue is that when we're
12 done with those negotiations and we have that process
13 completed, we file with this Commission the revised
14 change management governing documents. Other parties
15 can -- and then have a process where other parties
16 can comment upon those documents.

17 The change management process itself is
18 being evaluated in the ROC OSS test. There's
19 actually a whole separate test within the master test
20 plan that is dedicated just to change management,
21 where the vendors are going to be reporting on the
22 adequacy of our procedures, the adequacy of how we
23 follow them, the completeness of the change
24 management process. Basically, they are going to be
25 evaluating the change management process from

05343

1 beginning to end, so I don't feel like it's necessary
2 that further proceedings happen regarding change
3 management, but what I would suggest is that when
4 we're through with these negotiations, we will file
5 with this Commission revised change management
6 documents and we could have a comment period of the
7 parties.

8 The three remaining issues, then, after
9 that, I think can be handled in pretty much the same
10 way. Well, the same way among themselves. The first
11 is the Performance Assurance Plan, the QPAP. That is
12 currently being discussed in these -- what is it now
13 -- nine state workshops being run by Mr. Antonuk from
14 Liberty Consulting. All issues regarding the QPAP
15 have already been publicly addressed in workshops run
16 by the ROC. They are now going to be publicly
17 addressed in the nine-state proceeding, and all
18 issues will be dealt with there.

19 Once Mr. Antonuk's report comes out, which
20 is scheduled to be October 12, we would suggest that
21 there be a two-week period for people to file
22 comments. All parties file comments at the same
23 time, Qwest included, and that about approximately
24 seven days thereafter, the Commission hold a -- what
25 is sometimes called a legislative-style hearing,

05348

1 I think that's pretty much everything that
2 we have to do going forward. It will end up being a
3 considerable amount of work, but I think if we work
4 creatively and think about what really needs to be
5 done, we can do it in a fairly efficient process.

6 JUDGE RENDAHL: Thank you, Mr. Crain. Just
7 a few questions. When does Qwest expect the CICMP
8 process to -- when do you expect to complete your
9 discussions with the CLECs on the CICMP process?

10 MR. CRAIN: I would anticipate that those
11 would be completed sometime in September. They're
12 actually going very well.

13 JUDGE RENDAHL: Okay, thank you. And you
14 said that there's a separate test in the master test
15 plan for change management. And is that test testing
16 -- going to test the change management process that
17 will result after the discussions with the CLECs, or
18 is it testing a current process?

19 MR. CRAIN: They have already done many
20 interviews and taken a lot of evidence regarding the
21 current process, and I believe in the ROC we've
22 already gotten at least one observation or exception
23 on the process. The KPMG has made very clear all
24 along that as we change these kinds of processes or
25 procedures, they will go back and re-review the new

05349

1 process. So my anticipation is that they will also
2 review the new process, as well.

3 JUDGE RENDAHL: And if they review the new
4 process following your discussions in September, do
5 you have a time frame for when -- how long do you
6 expect it will take KPMG to conduct the testing and
7 obtain results on that?

8 MR. CRAIN: You know, I don't know. I'd
9 have to look at the project schedule, although I
10 don't even know if that would be giving us that much
11 information. I would think that KPMG could do that
12 fairly quickly. I don't know if it's a matter of a
13 couple of weeks or if it would take a month, but I
14 don't think it would take an extended period of time.

15 JUDGE RENDAHL: Okay. You mentioned that
16 it's now a nine-state multi-state process. Besides
17 the state of Washington, what other state do you know
18 has joined?

19 MR. REYNOLDS: Nebraska.

20 MS. YOUNG: Nebraska.

21 JUDGE RENDAHL: Thank you.

22 MR. CRAIN: Nebraska. Thanks.

23 JUDGE RENDAHL: If your time frames that
24 you're suggesting, if the Commission were to -- if
25 the OSS testing were to be done and the final report

05354

1 a little louder would be great.

2 MS. FRIESEN: Okay. Is this better?

3 JUDGE RENDAHL: Better, thank you.

4 MS. FRIESEN: As Becky noted, the FCC is
5 relying on the state commissions to conduct rigorous
6 investigation. Part of that investigation includes
7 that Qwest prove, by a preponderance of the evidence,
8 that it is in present compliance, actual present
9 compliance with its 271 obligations. And one of
10 those compliance pieces includes the CICMP process.

11 The FCC, in the SWBT, or the Texas 271
12 order, in paragraph 108, has defined five elements
13 that have to be met by the CICMP process. Now, what
14 Qwest has in the record today on its CICMP process
15 and the evidence that AT&T has put into the record
16 via the filing of some discovery responses and the
17 exception to Mr. Finnigan's testimony indicates that
18 the present CICMP process fails the FCC's test. It
19 isn't working.

20 What Qwest has done, they're saying to you
21 that we have to take this process back to CICMP and
22 out of the hands of the 271 process and the
23 Commission so that the CICMP folks can revamp it.
24 And AT&T doesn't necessarily have an issue with that,
25 but the problem that we have with taking it out of

05383

1 Covad and AT&T's concern. I know that I just
2 recently found out who was participating in the CICMP
3 process on behalf of Sprint, and they are operational
4 people, and that probably was appropriate to begin
5 with. But, certainly, with the way it's evolved,
6 it's important that policy issues are taken into
7 consideration, too.

8 I know Sprint is supporting the OBF change
9 management process in developing the new CICMP
10 process, and now that I'm working with our operations
11 folks, I'm a lot more comfortable with what's going
12 on there, but I share those concerns, also, with
13 regard to how that's being handled

14 JUDGE RENDAHL: Thank you, Ms. Young. Ms.
15 Hopfenbeck.

16 MS. HOPFENBECK: WorldCom supports the
17 recommendation that the remaining issues in this
18 proceeding be addressed in a workshop format, as
19 opposed to the legislative format that Mr. Crain
20 outlined.

21 I'm not -- for the reasons that I'll add in
22 more detail a little bit later, I'm not as whetted to
23 that workshop being one workshop to address all
24 remaining issues. And one of the concerns that
25 WorldCom has is that if the OSS test results are not

05384

1 produced until sometime substantially later than we
2 get to the conclusion of the modifications to CICMP
3 and the QPAP process is completed, WorldCom is
4 concerned that that final workshop that contains so
5 many issues to be addressed may be such that it has
6 to be very hurried. And that goes along with Mr.
7 Crain's representations that Qwest will file with the
8 FCC very -- as soon as possible after the ROC issues
9 its result on the testing process.

10 So that WorldCom can envision a procedure
11 whereby there is a final workshop, or a workshop, not
12 necessarily a final workshop, but a workshop
13 established to address CICMP, to address QPAP, and to
14 address what we view as compliance issues, compliance
15 issues relating to previous orders that have been
16 issued by this Commission and to address concerns
17 over Qwest's fulfillment of commitments that have
18 been made during this process and have that kind of a
19 workshop happen before a workshop that would address
20 both the results of the OSS testing and a review of
21 commercial usage, current commercial usage
22 performance data, which WorldCom views as being
23 something that should occur together.

24 Okay. I don't have a lot to add to what's
25 been said about why the issues that we've identified

05388

1 report on the ROC results waiting until the CICMP
2 test is complete, or will they issue a report and
3 then supplement it with a CICMP update?

4 MR. CRAIN: I don't know what their
5 intention is. Currently, the plan, the test plan and
6 everything allows for both of those to happen at the
7 same time. The schedule we're on for completing that
8 process allows them to do their evaluation before the
9 final test was issued. I anticipate that the CICMP
10 evaluation will be included in the final report.
11 It's possible they may actually issue an interim
12 report before that. If the test is delayed, they may
13 get done with the CICMP evaluation ahead of time and
14 submit an interim report, but my anticipation at this
15 point is it would be part of the final report.

16 JUDGE RENDAHL: Okay. So Ms. Hopfenbeck,
17 just so I'm clear about what your recommendations are
18 to the Commission, is that if the KPMG report is
19 delayed due to the CICMP issue or other issues, that
20 you would suggest that the Commission have a workshop
21 on the QPAP and any fulfillment of agreements,
22 compliance issues and any other performance related
23 issues, and then hold any -- whatever Commission
24 review of the CICMP and ROC testing as a separate
25 process?

05404

1 there when that ruling was made, I participated in
2 that discussion, and I remember very clearly what the
3 decision was. The 90-day procedural -- the 90-day
4 adjudicative process, as it was just called, was in
5 the original procedural order that was issued in
6 1997. We suggested that a series of workshops be
7 held, rather than a formal hearing, and the
8 Commission's ruling was basically, We're not going to
9 take that piece of -- that 90-day process out of the
10 procedural order, but we're going to review it at the
11 end to see if it's necessary. And that's what -- I
12 think that's reflected in the order.

13 That's what we're talking about. One of
14 the issues I think we need to address now, is that
15 necessary. And basically, what they were saying then
16 was we are ensured that this is going to be a
17 complete process where all the issues are really
18 going to be delved into in detail, because we've
19 never done this before. Now they have, and I think
20 there is no doubt, I don't think there could be any
21 doubt that all of the issues have been delved into in
22 excruciating detail here on every checklist item.

23 In terms of how to handle the rest of the
24 case, change management. Change management is being
25 dealt with in the change management process. It's

05405

1 also being completely reviewed by the vendors in the
2 ROC. I don't anticipate there are going to be any
3 significant issues remaining after we're done with
4 the negotiation process and I don't think that
5 there's any reason right now that a separate
6 proceeding ought to be set to review the change
7 management process. We'll file the change management
8 documents when we're done, people can file comments.
9 I think that's a reasonable way of handling that one.

10 Data review. We welcome data review. We
11 want to do it, we want to do it now. There's no
12 reason to wait till the end of the test to start
13 looking at people's data. In terms of the is our
14 data correct or is their data correct issue, one of
15 the things that I have heard is being proposed by at
16 least -- I've heard that other state commissioners
17 are looking at whether or not we should retain
18 Liberty to do that through the ROC process, and
19 that's actually a process we would welcome and we
20 would support, where Liberty would be able to look at
21 their data, our data, get us in a room together, if
22 necessary, and see whose data is correct and do that
23 kind of -- and that is really excruciating work in
24 terms of trying to figure out why one person's data
25 is different. So we anticipate that that will be

05411

1 that -- actually, all I heard was that Bob Roe raised
2 it as an issue and a proposal. That's all I've
3 heard.

4 JUDGE RENDAHL: Okay. Well, since it's an
5 unknown to almost everyone here at the table, I think
6 we can't do much with it now, but my request is if it
7 becomes reality, that Qwest and anyone -- any other
8 party who finds that to be an appropriate process, to
9 bring that to this Commission's attention as soon as
10 possible so that we can factor that in when making a
11 determination about future process here in
12 Washington.

13 MR. CRAIN: And we certainly will do that.

14 JUDGE RENDAHL: Thank you. So Mr. Crain,
15 you don't believe any of the issues needs to be dealt
16 with in a workshop process, in particular the QPAP
17 and the OSS testing results and data review?

18 MR. CRAIN: Yes, that is accurate. I don't
19 believe any of those are appropriate for workshop
20 process, and I don't think the workshop process would
21 be very fruitful in addressing those issues.

22 JUDGE RENDAHL: Okay. And to follow up on
23 a comment made by Ms. Hopfenbeck about the CICMP
24 process, and I may be incorrect as to whether it was
25 Ms. Hopfenbeck, there was a suggestion made that

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1 changes to the CICMP involved, that the CICMP has a
2 role, not just for OSS, the OSS process, but also it
3 has a role in the SGAT and various other places, and
4 a suggestion that there might need to be a workshop
5 to look at changes to SGAT sections on CICMP itself.
6 And I'm wondering what Qwest's thoughts are on that
7 particular point.

8 MR. CRAIN: There's only one -- well, there
9 are paragraphs in the SGAT that refer to the CICMP
10 process, and those have actually all been -- I
11 believe all been negotiated and addressed in the
12 separate checklist item workshops, with one sole
13 exception. And that sole exception is the -- there's
14 one paragraph in Section 12 in which Qwest says, We
15 will maintain a CICMP process. And I don't think
16 that that particular paragraph has been addressed,
17 but all the issues relating to that paragraph --
18 well, that's the only remaining issue that --
19 remaining section of the SGAT that refers to CICMP
20 that I believe hasn't been addressed in the
21 workshops.

22 JUDGE RENDAHL: Okay. Do you have any
23 further comments on future process? I think there
24 may be some comments around the table before we
25 close. Ms. Hopfenbeck, did you have --

05413

1 MS. HOPFENBECK: I just wanted to address
2 your last question on the CICMP and -- because it was
3 my observation that CICMP needed to come back here,
4 and that's because while it's true that the
5 provisions that reference CICMP have been closed,
6 they've all been closed subject to, you know,
7 condition on the understanding that the CICMP process
8 would be adequate to address those important issues.

9 And by those important issues, they're the
10 kinds of issues that Ms. Doberneck raised, which is
11 there's been -- in almost every workshop, the CLECs
12 have raised a concern about Qwest's practice of
13 unilaterally changing the terms and conditions under
14 which they must do business with it. And two,
15 concern about delays that they've experienced in
16 providing products because of an inadequate amendment
17 process for their interconnection agreements.

18 Those two issues are very important to
19 WorldCom, in particular, and without a review of
20 CICMP to see that there are processes in place to
21 address those concerns, we don't believe Qwest can be
22 found to be in compliance.

23 JUDGE RENDAHL: Okay, thank you. Is there
24 anything else before -- anything else on future
25 process before we're done with our prehearing

EXHIBIT 4

Doberneck, Megan

From: Powers, F. Lynne [flpowers@eschelon.com]
Sent: Wednesday, December 05, 2001 2:35 PM
To: 'Judith Schultz'
Cc: 'Ford, Laura'; 'Jim Maher'; Zulevic, Michael; 'Terry Bahner'; 'Liz Balvin'; 'Tom Dixon'; Doberneck, Megan; 'Evans, Sandy'; Gindlesberger, Larry; 'Hines, LeiLani'; 'Lee, Judy'; 'Littler, Bill'; 'Lees, Marcia'; 'Menezes, Mitch'; 'Osborne-Miller, Donna'; 'Quintana, Becky'; 'Rossi, Matt'; Stichter, Kathleen L.; 'Thiessen, Jim'; 'Travis, Susan'; 'VanMeter, Sharon'; 'Wicks, Terry'; 'Woodcock, Beth'; 'Yeung, Shun (Sam)'; 'Mark Routh'; Clauson, Karen L.
Subject: Escalation regarding Qwest's additional testing CR, #PC100101-5



escalationTesting.doc

Eschelon, Covad, and Allegiance initiate an escalation with respect to Qwest's additional testing CR, #PC100101-5. The completed escalation form is enclosed in Word format. (The web-based format didn't work well for this joint escalation.)

Because this issue has been discussed in re-design, we are copying the re-design participants as well, for their information.

Lynne Powers
Executive Vice President
Eschelon Telecom, Inc.
612-436-6642
flpowers@eschelon.com

Terry Wicks
LEC Account Manager
Allegiance Telecom, Inc
469-259-4438
terry.wicks@algx.com

Michael Zulevic
Director-Technical/Regulatory Support
Covad Network Planning and Capacity Mgmt.
520-575-2776
mzulevic@Covad.COM

> <<escalationTesting.doc>>
>

CMP Escalations and Dispute Submittal Form
Items marked by a red asterisk (*) are required.

*** CLEC Company Name:**

This escalation is submitted jointly by:

Eschelon Telecom, Inc.
Covad Communications
Allegiance Telecom Inc.

Referred to jointly as "CLECs."

*** Action Type:**

- select an action type -

Escalation

Entering a change request number is optional, but you are required to select a status (select "no change request number" if you choose not to enter a number).
Change Request Number:

CR #PC100101-5

Change Request Status:

- select one - no change request number Submitted Clarification/Evaluation
Presented Implementation CLEC Test Completed

CLECs believe that the appropriate status is "Denied" by CLECs. Qwest has listed the status as "Development."

NOTE: (Status choices on web need to be revised to include "denied" and "development.")

*** Description:**

Qwest provided this description of the CR: "Currently, CLECs' are responsible for testing UNE's prior to submitting a trouble report to Qwest. CLECs' are to provide test diagnostics including specific evidence that the trouble is in the Qwest Network along with the associated Qwest circuit identification number. If the CLEC elects not to perform the necessary UNE testing, Qwest will offer to do such testing on CLECs' behalf. If such testing is requested by the CLEC, Qwest will perform the additional testing and bill the CLEC the appropriate charges that are in their Interconnection agreement.

If the CLEC does not provide test diagnostics and elects not to have Qwest perform additional testing on their behalf, Qwest will not accept a trouble report. Additional

Charges may apply when the testing determines the trouble is beyond the Loop Demarcation Point This additional testing option is available on the Unbundled Loop Product Suite, Unbundled Dedicated Transport (UDIT), Enhanced Extended Loop (EEL) and Loop Mux."

*** History of Item:**

Qwest provides the following status history in its Interactive Report (*see* http://www.qwest.com/wholesale/downloads/2001/011203/CLEC_CMP_ProductProcess_Interactive_Report.PDF):

10/01/01 - CR received by Deb Smith of Qwest
10/01/01 - CR status changed to Submitted
10/01/01 - Updated CR sent to Deb Smith
10/17/01 - CMP Meeting: Qwest presented "Description of Change" and agreed to provide detailed package for CLEC review.
Walk through meeting to be scheduled by Qwest in the late October/early November 2001 time frame.
10/31/01 - CR presented to the participating CLECs at the Redesign Session. CLECs to provide comments.
11/08/01 - Qwest Notification (Document No. PROD.11.08.R.00197.Mtce&Repair Language; Subject: Update to Product Information on Maintenance and Repair Language within EEL, UDIT, LMC and Unbundled Loop General) transmitted to CLEC"

Eschelon provided Qwest with the following summary on 12/3/01:

" We have objected to this CR on several occasions. Other CLECs have objected as well. Terry Wicks of Allegiance has said that, at a minimum, there are too many unanswered questions at this time to implement it. There is no acceptance or consensus from CLECs. (Eschelon does not believe that rates can be established through a CR.) Yet, Qwest has said that it would implement the CR on December 1st. While we can continue to deal with the process issues raised by this approach in Re-Design, today is December 3rd, so we need to know ASAP that this particular CR has not been implemented (or, if implemented, in which states). Qwest does not have the authority to implement the rates in this CR in all states and circumstances described or to refuse trouble tickets, at least as to Eschelon (and others that have opted in to the same AT&T/WCOM contracts). Because it appears that Qwest plans to show the charges on the bill as "miscellaneous" charges, the charges will be difficult, if not impossible, to identify. We need to ensure that no unauthorized charges are placed on our bill. **Please let us know what activities were taken pursuant to this CR and what steps have been taken to ensure that unauthorized charges will not appear on our bill.**

As we discussed, Qwest did not provide citations to any interconnection agreements in its CR. Terry Wicks said at last week's re-design meeting that, when Qwest presented its CR at the CMP meeting, he asked whether Qwest had reviewed all contracts to be sure that all interconnection agreements required the process and rates in

the CR. Terry said that Qwest said it had done so. Eschelon asked Qwest to provide the citations to all of its contracts upon which Qwest relied for its CR. At a later meeting, Qwest agreed to do so. Qwest was later able to provide citations to interconnection agreements for only 3 of the 6 states in which Eschelon has switches (*see* email, copied at end of this email, from Dennis Pappas of Qwest). The rates cited are from the collocation sections of the rate attachments, and it is at least unclear that these rates were intended to apply to this situation. Moreover, the cited interconnection agreement language refers to a trouble isolation charge. It appears that Qwest plans to charge a testing charge, in addition to a trouble isolation charge, in some circumstances. For a fourth contract (Colorado), Qwest provided a citation to language but said "the rates were not noted in your ICA." (*See* email copied below.) Qwest provided no language or rates for MN or OR. Although the CR specifically states that Qwest will "bill the CLEC the appropriate charges that are in their Interconnection agreement," Qwest said on telephone and conference calls that it plans to charge CLECs retail or SGAT rates when a rate is not in the interconnection agreement. (Qwest's rates and basis for charging rates should be formally documented and not gathered from telephone conversations.) Qwest has provided no basis for charging Eschelon retail or SGAT rates, nor does Eschelon agree that those rates apply to Eschelon (which has not opted in to an SGAT). Moreover, Eschelon also provides testing in similar circumstances, and Qwest has not indicated that it intends to pay Eschelon for that testing. If Qwest can charge this rate, Eschelon should also be able to charge Qwest, particularly when Eschelon has to dispatch a technician to prove to Qwest that the trouble is in Qwest's network. Nonetheless, Dennis Pappas of Qwest has said that Qwest will not pay CLECs for providing the same services. Eschelon disagrees.

As Eschelon has previously indicated to Qwest, for the three interconnection agreements for which Qwest provided citation to language and rates (AZ, UT, WA), Eschelon does not agree that the language necessarily applies in the way that Qwest plans to implement it. For example, none of the contract language states that Qwest may refuse to accept a trouble ticket without test results, but Qwest's CR says that it will do so (and, in fact, Qwest has already started doing so, according to participants at the re-design meeting). The number of questions that CLECs have raised in meetings and conference calls is a reasonable indication that the documentation provided by Qwest to date is inadequate. Also, if Qwest is applying the testing process and charges consistently with interconnection agreements (and only when authorized by interconnection agreements, it is unclear why a CR was necessary. What is the "change" that Qwest is requesting?

At last week's re-design meeting, Michael Zulevic of Covad said that the CR is also not consistent with the SGAT language on this issue. I am not familiar with that issue, so I suggested to you on a break that you should follow up with him on that. Eschelon has not opted in to the SGAT.

As we have discussed with Qwest, Eschelon already performs testing. While it plans to continue doing so, its greatest objections to this CR are the rates, the manner in which Qwest plans to show the information on the bill (which is not specific enough for verification of charges), and the way this CR/process has been handled. Eschelon does not want it to set a precedent suggesting that this is acceptable going forward.

Many issues remain disputed, unanswered, or unclear. The interconnection agreement language cited by Qwest specifically requires the parties to work

"cooperatively." As we discussed at the re-design meeting, the process used for collocation decommissioning has aspects that could be used as a model in the future for cooperatively reaching agreement. In the meantime, however, Eschelon's immediate concern is ensuring that this CR is not implemented inappropriately. Please let me know what Qwest has in place today and, if this CR has not been suspended, whether it will be.

EMAIL FROM DENNIS PAPPAS OF QWEST:

[NOTE: Dennis called Garth Morrisette of Eschelon to indicate that the "critical sentence," referred to below, was that Qwest is relying upon tariffs for the rates not found in the contracts. On separate calls, Qwest has said that, if there is no rate in the interconnection agreement, Qwest will charge the SGAT rate. Eschelon has not opted in to the SGAT.

With respect to the citations to language below (except rates), the cites below are from Attachment 5 to the interconnection agreements."]

-----Original Message-----

From: Dennis Pappas

Sent: Wednesday, November 14, 2001 3:55 PM

To: Morrisette, Garth M.

Subject: Re: Optional Testing Response

Call me at your convenience, there is a critical sentence that I left out that I need to clarify. Thanks!

"Morrisette, Garth M." wrote:

Thanks Dennis - I'll review this and call you or our account team if I have questions.

Garth.

-----Original Message-----

From: Dennis Pappas

Sent: Wednesday, November 14, 2001 2:19 PM

To: gmmorrisette

Subject: Optional Testing Response

Good afternoon Garth

Just a recap for you. The language mentioned during our meeting was in AZ, UT and WA. In all three agreements, 3.2.17 spoke to responsibility for trouble resolution and 6.2.20.1.1 speaks to the billing of charges depending on where the trouble was isolated.

In CO, the language is in sections 5.1.17, 5.1.25 and 5.2.20.

The rates associated with these sections in AZ is in schedule 1 - attachment 1 under Common elements. Maintenance 1/2 hour increments - Regular is \$22.20 for each 1/2 hour and Overtime is \$31.57 for each 1/2 hour.

Rates in the UT and WA agreement are noted as "Maintenance Labor" and are - Basic \$26.97 / Overtime \$35.87 in UT and Basic \$25.36 / Overtime \$33.73 in WA.

Language existed in CO but the rates were not noted in your ICA. In this instance, we referenced the Tariff to get rates for Basic, Overtime and Premium "Additional Labor other" of \$28.91, \$38.61 and \$48.33 respectively.

Call me with any questions or contact your Account Team representative for additional details. Thank You

Dennis Pappas - Product Manager"

Allegiance provided the following information on 12/3/01:

"Allegiance Telecom has strong concerns regarding Qwest's implementation of the Additional Testing CR and insists that Qwest suspend implementation of Additional Testing charges until Qwest demonstrates the needs for such charges and terms, rates, and conditions for Additional Testing are mutually agreed to by both parties. As Terry Wicks has been stating in the CMP meetings, Allegiance is concerned about numerous unanswered questions concerning the Additional Testing CR, including the rates that Qwest is proposing to charge and the manner in which those rates would be included on an invoice. Since Qwest has not adequately responded to Allegiance's and other CLEC's repeated requests for clarification of this process, Allegiance requests that this CR be immediately suspended and that Qwest clarify the terms, rates and conditions it is proposing for such testing.

It is Allegiance's position that rates must be contained in an effective tariff or an interconnection agreement. Thus, until such time as Qwest has clearly articulated the terms, rates and conditions for Additional Testing and our companies have concluded an amendment or Qwest has an effective tariff, Allegiance can not be held liable for any charges for Additional Testing."

Covad provided the following information to Qwest on 12/4/01:

"I could not agree more strongly with Karen on the issue of additional testing. As I stated at last week's meetings, not only does Covad find the proposal made by Dennis Pappas and Bill Campbell unacceptable, but it is also inconsistent with the language negotiated during the SGAT 271 workshops. This is exactly the kind of unilateral action historically taken by Qwest that has led to the need to redesign the Change Management Process. It was my understanding that the proposal was being tabled and re-thought and that Qwest would seek agreement with CLECs through the

Change Management Process prior to implementation. I sincerely hope this is still Qwest's plan."

*** Reason for Escalation / Dispute:**

Qwest has denied the request of CLECs to suspend the CR at least while clarifying the, unanswered questions and attempting to gain consensus when possible. Implementation of the CR violates interconnection agreements with CLECs. Many questions remain unanswered. Escalation is urgent, because Qwest has already implemented the CR over CLECs' objections. With so many unanswered questions, CLECs cannot even determine exactly what has been implemented and whether their individual interconnection agreements are being handled differently. Also, because of the manner in which Qwest is handling the billing of the charges per this CR, bill verification is difficult if not impossible.

CLECs believe that Qwest should be the party responsible for initiating an escalation in this case, because Qwest did not clarify the process and was unable to gain CLEC consensus or approval before implementing its CR. Because Qwest has not initiated the escalation, however, CLECs initiate this escalation.

*** Business Need and Impact:**

For all of the reasons stated above and in meetings and conference calls on this issue, the business need/impact associated with this CR is substantial. This is particularly true because of the potential precedent set by this CR for the handling of future CRs and implementation of rates.

*** Desired CLEC Resolution:**

Suspend implementation of Qwest-initiated CR #PC100101-5 (process and rates).

Review any steps that Qwest has taken to make system changes, train people, or otherwise implement this CR universally at Qwest to ensure compliance with particular interconnection agreements (*e.g.*, interconnection agreements with Eschelon, Covad, and Allegiance in each state). This includes re-training, etc., as to the differences among various interconnection agreements, as well as difference from the SGAT. (Eschelon, Covad, and Allegiance each has an interconnection agreement with Qwest, and none of these CLECs has opted into the SGAT.)

Provide documentation showing that Qwest has trained its personnel and taken other steps to ensure compliance with individual interconnection agreements, including differences in those agreements as compared with the SGAT.

Begin a collaborative effort (similar to that used for collocation decommissioning) to develop an improved process and, when possible, gain consensus before implementation.

Ensure that part of the process is to provide accurate bills that reflect interconnection agreement rates and provide sufficient information for bill verification. If no consensus can be reached, Qwest should then be responsible for escalation before implementation.

Ensure reciprocity so that CLECs may recover their costs in the same circumstances in which Qwest is allowed to recover its costs for such testing.

CLEC Contact Information

Allegiance:

Terry Wicks
LEC Account Manager
Allegiance Telecom, Inc
469-259-4438
terry.wicks@algx.com

Covad:

Michael Zulevic
Director-Technical/Regulatory Support
Covad Network Planning and Capacity Mgmt.
520-575-2776
mzulevic@Covad.COM

Eschelon:

Lynne Powers
Executive Vice President
Eschelon Telecom, Inc.
612-436-6642
flpowers@eschelon.com

EXHIBIT 5

Doberneck, Megan

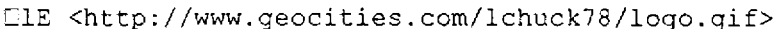
From: Powers, F. Lynne [flpowers@eschelon.com]
Sent: Friday, December 07, 2001 3:42 PM
To: 'Judith Schultz'
Cc: 'Ford, Laura'; 'Jim Maher'; 'Terry Bahner'; 'Liz Balvin'; 'Tom Dixon'; Doberneck, Megan; 'Evans, Sandy'; Gindlesberger, Larry; 'Hines, LeiLani'; 'Lee, Judy'; 'Littler, Bill'; 'Menezes, Mitch'; 'Osborne-Miller, Donna'; 'Quintana, Becky'; 'Rossi, Matt'; Stichter, Kathleen L.; 'Travis, Susan'; 'VanMeter, Sharon'; 'Wicks, Terry'; 'Woodcock, Beth'; 'Yeung, Shun (Sam)'; 'Mark Routh'; Powers, F. Lynne; Zulevic, Michael; Clauson, Karen L.; Stichter, Kathleen L.
Subject: FW: Escalation/Desired CLEC Resolution: Product:UNE:RN: Pending Updates to EEL,LMC,UDIT & Unbundled General, Effective 12-12-01, Final
Importance: High

The mailout below relates to "Optional Testing" and states that "there were no comments returned to Qwest regarding this change." The change relates to Qwest-initiated CR# PC100101-5. Given the number of communications, written and oral, about this issue, as well as the pending joint escalation, Eschelon does not understand how the notice can indicate that no comments were returned to Qwest.

Eschelon asks Qwest to consider, as part of the "Desired CLEC Resolution" section of the Escalation of CR# PC100101-5, a request to suspend these PCAT changes.

In addition, for purposes of Re-Design, Eschelon asks Judy Lee to add an action item to discuss a process for ensuring that the administrator of these mailouts is notified of comments made through CMP, account teams, etc.

> -----Original Message-----

> From: mailouts@qwest.com [SMTP:mailouts@qwest.com]
> Sent: Friday, December 07, 2001 4:00 PM
> To: qwest.all.notices@eschelon.com
> Subject: Product:UNE:RN: Pending Updates to EEL,LMC,UDIT & Unbundled
> General, Effective 12-12-01, Final
>
>  <http://www.geocities.com/lchuck78/logo.gif>
>
> December 7, 2001
>
> Qwest All Notices
> Eschelon Telecom Inc.
> 730 Second Ave S #1200
> Minneapolis, MN 55402
> qwest.all.notices@eschelon.com
>
> To: Qwest All Notices
>
> Announcement Date: December 7, 2001
> Effective Date: December 21, 2001
> Document Number: PROD.12.07.01.F.00603.Pending_ULL_ELL_LMC_UDIT
>
> Notification Category: Product
> Target Audience: CLECs, Resellers
> Subject: Pending Updates to Unbundled Local Loop General, EEL,
>
> LMC and UDIT Product Catalogs Change Request Number:

>
> CR PC1-1-1-5
>
>
>
>
> Beginning December 21, 2001, Qwest will issue updates to its Wholesale
> Product Catalog that include new/revised documentation for Unbundled
Local
> Loop General, Enhanced Extended Loop (EEL), Loop MUX Combination (LMC
and
> Unbundled Dedicated Interoffice Transport (UDIT).
>
> These updates will reflect new Maintenance and Repair language that ;
> includes information on optional testing. This proposed change was
posted
> for review from November 8 through November 23, 2001. There were no
> comments returned to Qwest regarding this change.
>
> These review documents will remain posted on the Document Review site
for
> reference only until December 20, 2001. You will find this at URL:
> <<http://www.qwest.com/wholesale/cmp/review.html>>.
>
> You are encouraged to provide feedback to this notice through our web
> site. We provide an easy to use feedback form at
> <<http://www.qwest.com/wholesale/feedback.html>>. A Qwest representative
> will contact you shortly to discuss your suggestion.
>
>
>
> Note: While these updates reflect current practice, it is important to
> note that there are additional changes that will be forthcoming as a
> result of ongoing regulatory activities e.g., collaborative workshops
and
> state commission orders. As these changes are defined and
implementation
> dates are determined, notice of additional updates will be provided
> accordingly.
>
>
> If you have any questions or would like to discuss this notice please
> contact your Qwest Service Manager, Pat Levene on 6126636265. Qwest
> appreciates your business and we look forward to our continued
> relationship.
>
> Sincerely,
>
>
> Qwest
>
>
> The Qwest Wholesale Web Site provides a comprehensive catalog of
detailed
> information on Qwest products and services including specific
descriptions
> on doing business with Qwest. All information provided on the site
> describes current activities and process.
>
> Prior to any modifications to existing activities or processes
described
> on the web site, wholesale customers will receive written notification
> announcing the upcoming change.
>
>
> cc: Judy Rixe
>

> Pat Levene
>

EXHIBIT 6



Announcement Date: October 31, 2001
Effective Date: Immediately

Document Number: GENL.10.31.01.F.00184.Billing_Rate_Verification
Notification Category: General Update
Target Audience: CLECs, Resellers

Subject: General Announcement regarding Billing Rate Verification

TO:

Qwest has undertaken a rate validation project to verify that your bill properly reflects the rates ordered by the State Commission and/or the rates modified as a result of contract negotiations. Where necessary, Qwest is updating the rates for your contract and verifying that those rates are correctly reflected in our billing systems.

In the event that our billing systems do not reflect the correct rate, we are taking the necessary steps to update the rate in the billing system. You will begin seeing the revised rates and applicable adjustments beginning with your October/November bill.

This policy applies to those Wholesale Customers doing business in Arizona, Colorado, Iowa, Montana, North Dakota, New Mexico, Oregon, South Dakota, Utah, Washington, and Wyoming.

Please contact your Qwest Billing Representative for specific details or if you have any questions.

Sincerely,

Qwest

Note: While these updates reflect current practice, it is important to note that there are additional changes that will be forthcoming as a result of ongoing regulatory activities e.g., collaborative workshops and state commission orders. As these changes are defined and implementation dates are determined, notice of additional updates will be provided accordingly.

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process. Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.



Announcement Date: November 14, 2001
Effective Date: Immediately
Document Number: GENL.11.14.01.F.00210.Billing_Rate_Verification_Revised
Notification Category: General Update
Target Audience: CLECs, Resellers
Subject: General Announcement regarding Billing Rate Verification

TO:

Qwest recently issued notification Letter, "GENL.10.31.01.F.00184.Billing_Rate_Verification," in regards to Billing Rate Verification. At the time the original Notification was issued, the states of Idaho, Minnesota and Nebraska were excluded from the policy. The policy has now been modified to include all 14 states in Qwest's serving area. Qwest is re-issuing the notice to include the three states that were originally excluded.

Qwest has undertaken a rate validation project to verify that your bill properly reflects the rates ordered by the State Commission and/or the rates modified as a result of contract negotiations. Where necessary, Qwest is updating the rates for your contract and verifying that those rates are correctly reflected in our billing systems.

In the event that our billing systems do not reflect the correct rate, we are taking the necessary steps to update the rate in the billing system. You will begin seeing the revised rates and applicable adjustments beginning with your October/November bill.

This policy applies to those Wholesale Customers doing business in Arizona, Colorado, Idaho, Iowa, Minnesota, Montana, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington, and Wyoming.

Please contact your Qwest Billing Representative for specific details or if you have any questions.

Sincerely,

Qwest

Note: While these updates reflect current practice, it is important to note that there are additional changes that will be forthcoming as a result of ongoing regulatory activities e.g., collaborative workshops and state commission orders. As these changes are defined and implementation dates are determined, notice of additional updates will be provided accordingly.

EXHIBIT 7

Eschelon's Escalation of CR # PC032801-4
January 3, 2001

Description

This escalation deals with the simple proposition that a customer has a right to know when rates and terms pursuant to its contract and business relationship are altered. The customer also should be told the basis for the change and be given an opportunity in advance to dispute the change, if the customer can show a basis in the contract or otherwise for doing so. At a minimum, the customer should be able to identify when and how rates and terms are changed. Despite the simplicity of these fundamental business concepts, Eschelon has been pursuing this issue since at least January of 2000, to no avail. Now, after two formal CRs and many requests to Eschelon's account team, Qwest has embarked upon a bill "validation" process that makes the very kinds of changes that Eschelon has protested without implementing any of the safeguards that Eschelon has requested. Eschelon once again asks Qwest to suspend Qwest's bill "validation" process and work cooperatively with Eschelon and other CLECs to develop a workable process. Eschelon escalates Qwest's failure to process CR # PC032801-4 (and CR # 5043204) in a timely manner, failure to follow CMP processes for system and process changes affecting Eschelon's rates and profile, and Qwest's recent refusal to suspend a bill "validation" process that will result in rate and profile changes without advance notice and opportunity to dispute changes.

History of Item

On August 31, 2000, Eschelon submitted CR # 5043204 to Qwest. The description of the requested change provides:

Eschelon seldom receives notification of billing changes (rates/terms/etc.). Qwest simply makes the changes with no explanation of why the changes were made. Proper notification should include the rate change or rate structure change with references to specific tariff sections, interconnection sections, or contract sections of applicable documents.

As indicated in an Eschelon email to its then account manager at Qwest on September 6, 2000, at that time, Eschelon had already been pressing the issue of advance notification of rate changes for eight months – *since at least January of 2000*. ("During the past 8 months, Eschelon has informally approached Qwest on these issues with either yourself, billing reps or our former account rep. . . .")¹

¹ Qwest listed CR # PC032801-4 in the distribution packages for CMP meetings dated October 18, 2000, November 15, 2000, December 20, 2000, and January 17, 2001. The most recent of these distribution packages lists the CR as being on "hold" for discussion in the Product/Process CMP. Eschelon could not find this CR in Qwest's list of CRs currently on the web. Notes in the distribution packages indicate that Eschelon should attempt to obtain notice of rate changes through its account team. Eschelon has tried to do so, but Qwest has nonetheless failed to provide such notice.

On March 26, 2001, Eschelon submitted CR # PC032801-4 to Qwest. The description of the requested change provides:

Qwest requires CLECs to complete customer questionnaires/profiles, in addition to entering into interconnection agreements with Qwest, when CLECs enter a Qwest state. Periodically, the questionnaires/profiles are updated, agreements are amended, or rates change. When these documents are completed or rates change, Qwest generally makes changes in its systems to reflect such changes. For example, if a CLEC signs an amendment to its interconnection agreement that contains new rates, Qwest may load additional USOCs with those rates into a table that is specific to that CLEC in that state. Before the USOCs and rates are loaded, Qwest's systems reject orders for items associated with those USOCs. After they are loaded, the systems will process the orders. While some of these changes may be apparent to the CLEC because they coincide with execution of such documents, sometimes Qwest makes unanticipated changes to the system or the codes. For example, Eschelon has been ordering coordinated cutovers in Minnesota for some time. Suddenly, without notice to Eschelon, Qwest's systems began to reject those orders. Upon inquiry, Qwest's representatives indicated that Qwest had performed a "scrub on interconnect contracts" pursuant to which Qwest unilaterally determined that Eschelon could not order coordinated cutovers in Minnesota because Eschelon had not signed a contract amendment proposed by Qwest. Only after Eschelon demonstrated that its existing contract, without amendment, provides for coordinated cutovers did Qwest restore Eschelon's ability to use the functionality of IMA to order coordinated cutovers. In the meantime, Eschelon's orders were disrupted. If Qwest had notified Eschelon sufficiently in advance of its "scrub" of Qwest's plans, Eschelon could have addressed the issue at that time and avoided the disruption to its ordering and provisioning processes. Qwest should implement a process to provide advance notice to CLECs before changes are made to the CLEC's profile and rates in Qwest's systems. The notice should be sufficiently detailed to allow the CLEC to understand the implications of the change and should be provided sufficiently in advance of any change to allow the CLEC to object, if necessary. A process should be put in place to handle objections to changes **before the changes are made.** (emphasis added)

Qwest's Status History (on the web) provides:

"03/26/01 - CR Received from K. Clauson of Eschelon
03/28/01 - CR Logged and status changed to New – To be Evaluated
04/06/01 - Status changed to Reviewed – Under Consideration
04/06/01 - Discussed in April CR Review Meeting
04/16/01 - Qwest will address this during the April CICMP Industry Team Meeting (TK - SC)
04/18/01 - Qwest is currently working this issue (AZ)
05/14/01 - Qwest has identified 3 circumstances (1) Contract amendment or new contract in which the Qwest Service manager will provide notification, (2) Cost Dockets or state

PUC rulings in which letters are mailed to effected CLECs, (3) Internal maintenance required in which a process is currently being developed in which the Qwest Service managers will provide notification to the CLEC. Written documentation will be prepared by Qwest and communicated externally, tentative time frame for notification TBD. (AZ) 08/09/01 - CR Response sent to the CICMP team via email and included in the August CICMP Distribution Package. (MR)

08/15/01 - CLEC CMP Meeting Product & Process Qwest's response dated 08/03/01 was presented

09/19/01 - CMP Meeting -Qwest provided status update.

09/27/01 - Qwest's draft response posted to database.

10/17/01 - CMP Meeting: Qwest presented draft response. Qwest to revisit response and address "Clarification on how CLEC gets notification on rate and USOG changes." No "Current Status" change.

11/09/01 - Revised Draft Response dated 11/09/01 sent to Eschelon and posted in dBase.

11/14/01 - CMP Meeting - Qwest presented its revised response. CLECs expressed concern over changes to rate table without advance notifications. Qwest requested that this subject be reviewed off-line. It was agreed that this would be an agenda item for next month's CMP meeting.

12/12/01 - CMP Meeting - Alan Zimmerman, Qwest presented an update to the current Qwest response regarding advance notice of profile and rate table changes. A written summary of this update has been posted in the CMP database. Qwest indicated that an internal validation (scrub) of the profile and rate tables is currently in progress for all CLECs. This validation addresses USOCs and SGAT rates, and should be completed this year. The CLEC community requested a redline of the validation changes prior to incorporation into billing. Qwest indicated that no feasible mechanism is available to provide advance notification for the validation exercise. However, Qwest will provide final USOG and SGAT rates for all CLECS when the validation effort is completed. Eschelon requested that the current validation effort by Qwest be stopped until an advanced notice procedure is in place. Discussions resulted in Qwest committing to re-look ways to provide advance notice for the validation exercise. Qwest committed to instituting a new process by March 1, 2002 to provide advance notice to the CLECs for the following rate change catalysts: (1) future rate validation efforts, (2) cost dockets, (3) new/existing interconnect agreements, (4) bill errors/disputes, and (5) new product implementation and product price changes. "Current Status" of CR remains in "Presented" status."

Reason for Escalation

Eschelon has requested notice of rate and term changes for at least **two years**. CR # PC032801-4 has been pending since March 26, 2001. Nonetheless, **after** all of these requests, Qwest implemented its bill "validation" process and proceeded with rate and profile changes without advance notice to Eschelon and over Eschelon objections.² At

² To the extent that Qwest has provided any notice, the notices have been general documents saying that some changes are or had occurred without providing specific information identifying the changes, support (such as citations to interconnection

the CMP meetings in November and December of 2001, Qwest said that it was proceeding with a bill "validation" process that would result in rate and profile changes without advance notice to CLECs as to the specific nature of the changes. Qwest has not provided any citations to provisions of Eschelon's interconnection agreements showing Qwest has authority to make each change. A very real possibility exists that Qwest may be unilaterally imposing terms on Eschelon that are inconsistent with Eschelon's interconnection agreement with Qwest. Qwest's bill "validation" process was started after Eschelon submitted its CRs asking Qwest for notice and opportunity to object before such changes were made. Qwest said that it does not plan to provide a red-line or other documentation showing each change made to date. Without such documentation, identifying and verifying the changes manually will be virtually impossible. (If Qwest cannot identify them, how are CLECs supposed to do so?) At a minimum, doing so will be a labor intensive process that will force Eschelon and other CLECs to expend resources and money needlessly. At both CMP meetings, in November and December of 2001, Eschelon's President and Chief Operating Officer, Rick Smith, emphasized the importance of this issue to Eschelon's business and asked Qwest to suspend its bill "validation" process until Qwest implemented a better process. Other CLECs joined in these comments. But, Qwest has not suspended the process. Therefore, by the time that Eschelon receives a complete response to its CR, most or all of Qwest's project will be completed. Eschelon repeats its request that Qwest suspend the validation process and work cooperatively with CLECs to implement a workable process.

Business Need/Impact

The business impact is substantial. In the situation that prompted CR #PC032801-4, provisioning of Eschelon's cutovers in Minnesota was brought to a standstill until Qwest reversed a profile change that never should have been made. This directly and adversely affected Eschelon's end-user customers. Had Eschelon been given advance notice and procedures been in place to deal with objections before implementation of changes, as

agreements) for the changes, or supporting documentation. In an email dated November 26, 2001, Eschelon informed Qwest's CMP Managers that the notices Qwest was sending did not address the concerns raised by Eschelon in this CR. Eschelon said: "Just to confirm: The mailouts described below do not address the concern raised in our CR on Advanced Notice of Profile and Rate Changes. (In fact, the mailouts increase the concern.) We need specific notice of each change to Eschelon's rates or profile (with the basis for the change). A general notification that a validation [sic] is happening simply means that specific notice will be needed sufficiently in advance of any change, if any changes are made as a result of the validation." Eschelon cannot even identify the date(s) on which changes were made much less identify each change. This makes it impossible to confirm whether the changes were proper or to assess the financial impact on Eschelon's business. In its CR, Eschelon asked for meaningful, advance notice of each change. Eschelon also asked that objections be handled **before** changes were implemented. Without such a process, there is no way to confirm compliance with Eschelon's interconnection agreements.

requested, Eschelon's end users and Eschelon's business would not have been adversely affected. The whole situation could have been avoided.

The inability to identify, analyze, plan for, dispute, and respond to rate and profile change is a legitimate, important business need. Eschelon needs to be able to identify potential changes and, if they are valid, plan for them in its budgeting and provisioning processes. These are simply a good, efficient business practices. Qwest is preventing Eschelon from operating efficiently by not providing sensible information in advance of proposed changes. Qwest is not even planning to identify specific changes after the fact for changes that it has recently made. Therefore, an additional business impact is the expenditure of time and resources to manually attempt to find the changes and determine their financial impact. A very real possibility exists that Qwest may be unilaterally imposing terms on Eschelon that are inconsistent with Eschelon's interconnection agreement with Qwest. Qwest has prevented Eschelon from verifying this by making validation of Qwest's bills a time-consuming and unrealistic effort. Qwest should not be able to unilaterally impose such an unnecessary burden on Eschelon and other CLECs.

For all of the reasons listed above, the business need is great and the impact is substantial.

Desired CLEC Resolution

Suspend Qwest's bill "validation" process and work cooperatively with Eschelon and other CLECs to develop a workable process.

Identify changes made to date and provide basis and documentation for each change.

Before implementing rate and profile changes, make the changes requested in CR #PC032801-4, including providing adequate, specific information in advance of changes to allow CLECs to determine the financial and business impacts of the changes, providing basis (authority) for the changes, and handling objections before implementing changes.

Ensure compliance with interconnection agreements and provide sufficient information to Eschelon and other CLECs to allow them to verify this.

Adhere to CMP processes before making such changes.

EXHIBIT 8

EXCEPTION 3094 – FIRST RESPONSE

Qwest OSS Evaluation

Initial Release Date: December 12, 2001

First Supplemental Response Date: January 7, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Change Management Test, MTP Test 23.

Exception:

Qwest did not adhere to its established change management process for notifying CLECs about a proposed change, and allowing input from all interested parties.

Background:

The Qwest Product/Process Change Management Process (CMP) is the method used by both Qwest and CLECs to introduce and implement changes to Qwest wholesale products and business processes. The Qwest CMP managers are responsible for the administration of Change Requests (CRs) and Notifications, including changes to, and updates of, relevant Qwest documentation. The Qwest Subject Matter Experts (SMEs) are responsible for the products and processes associated with proposed changes.

KPMG Consulting observed an instance in which Qwest did not provide CLECs with complete information about, and a reasonable interval for, a CLEC-impacting CR. On October 17, 2001 Qwest informed CLECs of a Qwest-initiated Process CR PC100101-5 "Clarification of additional testing process" (see Attachment A), which was scheduled for implementation on November 19, 2001¹. At a follow-up meeting on October 31, 2001, CLECs reported to Qwest that the CR would affect their business operations, and that Qwest did not provide adequate information about this CR to answer the following questions:

- Regulatory: CLECs requested that Qwest investigate whether or not the proposed CR would comply with Qwest's legal obligations, such as SGATs and Interconnection Agreements;
- Products: CLECs requested that Qwest provide a list of all products affected by this CR. At the follow-up meeting, Qwest was unsure if the CR would affect line-shared loops; and
- Documentation: CLECs requested that Qwest include the precise wording of the affected Product Catalogue (PCAT) in the CR. In the CR, Qwest provided limited text to describe the new process, and how the changes would affect CLECs.

¹ Information about this CR and supporting documentation (process documentation, process presentation, and Question & Answers) may be found at <http://www.qwest.com/wholesale/cmp/changerequest.html>.

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In order to respond to the remaining CLEC inquiries, Qwest scheduled a follow-up meeting on November 26, 2001, and delayed the scheduled implementation until December 1, 2001.

During CMP Redesign meetings, at least three CLECs made an attempt to halt the implementation date and escalate this CR. Qwest implemented CR PC100101-5 on December 1, 2001, and distributed a notification on December 3, 2001².

The event timeline for the CR that is the subject of this Exception is as follows:

Date	Event
10/17/2001	Qwest presented change request (CR) PC100101-5 "Clarification of additional testing process" at the monthly Change Management meeting.
10/31/2001	Follow-up meeting held – Intended for Qwest to clarify outstanding issues.
11/26/2001	Follow-up meeting held – Qwest answered some of the questions from CLECs.
12/01/2001	Scheduled process implementation date
12/04/2001	Qwest notification about update applied to CEMR User Guide. CLECs issue written statement requesting a status update, and that Qwest immediately stop implementation of this CR.

Issue:

KPMG Consulting observed the following issues related to CR PC100101-5:

- Qwest, through the CMP, did not provide adequate information to CLECs about a significant CLEC-impacting process change;
- Once Qwest had answered some of the important regulatory, product, and documentation questions, Qwest allowed only four (4) business days for CLECs to prepare for the proposed change³;
- Qwest, through the CMP, did not respond to input from all interested parties; a number of CLECs objected to Qwest's implementation of this change and requested its immediate suspension.
- Qwest, through the CMP, did not update CR status on a timely basis;
- Qwest CR includes rate changes that are not explicitly defined to be within the scope of CMP.

² Qwest notification titled "Documentation: CEMR: User's Guide Updated: 12/03/01."

³ At the time of this report, KPMG Consulting observed that Qwest and CLECs had not agreed on all legal and regulatory aspects of this CR.

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Impact:

Qwest did not adhere to its established change management process for notifying CLECs about proposed changes, and allowing input from all interested parties. In this instance, Qwest's failure to conduct thorough research prior to CR initiation necessitated follow-up investigations that increased the length of legal, regulatory, and operational discussions, thereby reducing the time allowed for CLECs to prepare for proposed changes. Any changes that are implemented without close examination by all interested parties may override Qwest's prior agreed upon service obligations to CLECs.

Qwest Formal Response (12/21/01):

This Exception is premised on KPMG's statement that "Qwest did not adhere to its established change management process for notifying CLECs about proposed changes" in processing the CR at issue. KPMG appears to assume that the process that applies to this CR is the *Interim Qwest Initiated Product/Process Change Request Initiation Process* that was developed in the CMP Redesign Sessions. CLECs have now clearly stated, however, that they never intended for that interim process to apply to the Qwest-initiated change at issue here.

At the time Qwest issued this CR, Qwest believed that this interim process might apply to the testing process clarification and, therefore, in good faith, submitted a CR. However, there was confusion between Qwest and the CLECs regarding the applicability of that interim process. The CLECs subsequently clarified at the December 10-11, 2001 redesign session that they never intended for that interim process to only apply to anything except changes that arose from 271 workshops or OSS testing. The interim process, as clarified by the CLECs and agreed to by Qwest, currently calls for Qwest to initiate CRs *only* for changes that alter CLEC operating procedures (as determined by Qwest), and that are made as a result of third party test or a 271 Workshop. Therefore, under the established change management process, Qwest was not required to submit or process a CR for this issue in the first place. Nonetheless, even though submission of the CR turned out not to be necessary, Qwest submitted a CR in good faith and followed the interim process.

Qwest's responses to each of the five bullet points KPMG raises are set forth below.

KPMG Issue: *Qwest, through the CMP, did not provide adequate information to CLECs about a significant CLEC-impacting process change;*

Qwest Response:

Qwest provided information and answered CLEC questions regarding this CR by introducing CR No. PC100101-5 to the CLEC community through the Change Management Process (CMP). As noted above, at the time Qwest submitted this CR, it did so based on a good faith effort to comply with the *Interim Qwest Initiated*

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Qwest OSS Evaluation

Product/Process Change Request Initiation Process. Since that time, the CLECs have clarified that they want that process to only apply to certain changes arising from 271 workshops or OSS testing. All other Qwest initiated product/process changes will be discussed at future Redesign sessions. At those future sessions, the nature and amount of information that Qwest must provide regarding its product/process CRs will be defined. Thus, Qwest provided more information than was required under existing processes by submitting the CR to the CLECs.

Qwest's efforts to provide information did not stop with submitting the CR. Qwest held at least three meetings with CLECs to provide information and answer CLEC questions relating to the CR. See Chronology of Events below.

KPMG Issue: *Once Qwest had answered some of the important regulatory, product, and documentation questions, Qwest allowed only four (4) business days for CLECs to prepare for the proposed change⁴;*

Qwest response:

The process for additional testing described in the CR, which was introduced on October 17, 2001, did not change from that time until the time it was fully implemented on December 1, 2001. Thus, the CLECs had more than 6 weeks -- not only 4 days -- to prepare for the change. The chronology below outlines the key notification dates relating to this CR.

Chronology of Events for CR No. PC 100101-5

- 10/17/01 - CMP Meeting: Qwest introduced "Description of Change" and agreed to provide detailed package for CLEC review. Walk through meeting to be scheduled by Qwest in the late October/early November 2001 time frame.
- 10/26/01 - Notification forwarded to the CLEC community regarding presentation of CR in the October 31, 2001 CMP Re-Design Meeting.
- 10/31/01 - CR presented to the participating CLECs at the CMP Re-Design Meeting. CLECs were requested to provide comments. **Qwest agreed to delay initial implementation date to address CLEC concerns.**
- 11/08/01 - Qwest Notification (Document No. PROD.11.08.R.00197.Mtce&Repair Language; Subject: Update to Product Information on Maintenance and Repair Language within EEL, UDIT, LMC and Unbundled Loop General) transmitted to CLEC community.
- 11/08/01 - PCAT Documents posted to the Qwest Wholesale CMP Document Review website: <http://www.qwest.com/wholesale/cmp/review.html>. Comments from CLEC community

⁴ At the time of this report, KPMG Consulting observed that Qwest and CLECs had not agreed on all legal and regulatory aspects of this CR.

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- due in 15 calendar days (11/23/01), as stated in "Interim External Change Management Process for Qwest Initiated Product/Process Changes," Version 6 – 11/26/01.
- 11/13/01 - Notification transmitted to CLEC community regarding follow-up meeting scheduled for 11/26/01.
- 11/14/01 - CMP Meeting - Qwest advised CLEC community that PCAT documents currently are available for comment.
- 11/24/01 - No comments were received from the CLEC community regarding PCAT documents posted to the Qwest Wholesale CMP Document Review Website.
- 11/26/01 - Qwest conducted a follow-up meeting with the CLEC community to discuss any technical issues with the CR (primarily operational and testing issues). Responses to questions were prepared for posting on the Qwest Wholesale WEB page.
- 11/28/01 - "Questions & Answers for Additional Testing 11/26/01" document posted to Qwest Wholesale website <http://www.qwest.com/wholesale/cmp/changerequest.html>
- 11/28/01 - "Additional Testing Process Document - 11/09/01" and "Additional Testing Process Presentation - 11/09/01" posted to Qwest Wholesale website: <http://www.qwest.com/wholesale/cmp/changerequest.html> These documents were previously posted in the Qwest Wholesale CMP Re-Design website: <http://www.qwest.com/wholesale/cmp/redesign.html>
- 11/30/01 - Qwest IT Wholesale Communicator, November 30, 2001, Document No. SYST.11.30.01.F.02444_CEMR_UG_Update, CEMR User's Guide Update transmitted to Qwest Wholesale Customers
- 12/05/01 - Formal Escalation received from Eschelon regarding implementation of CR.
- 12/06/01 - Qwest response sent acknowledging receipt of Formal Escalation from Eschelon (PC100101-5-E01).
- 12/07/01 - KMC Telecom notified Qwest to participate in the formal escalation initiated by Eschelon.

KPMG Issue: *Qwest, through the CMP, did not respond to input from all interested parties; a number of CLECs objected to Qwest's implementation of this change and requested its immediate suspension.*

Qwest response:

Qwest acted on CLEC input by holding additional meetings and agreeing to delay the original implementation date. Further, the processes that Qwest and the CLECs agreed to use for resolving disagreements are the escalation and dispute resolution processes. CLECs have invoked the escalation process with regard to this CR. In accordance with that process, Qwest responded to the escalation and offered a proposed process for resolving the CLEC concerns. Qwest will continue to abide by the agreed processes for resolving the disagreements relating to this CR and hopes to reach a mutually agreeable solution to the issues.

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KPMG Issue: *Qwest, through the CMP, did not update CR status on a timely basis;*

Qwest response:

The CMP database is posted to the website on an “every third day” basis with updated CR status, status history, responses, meeting minutes, etc. for all active CRs. Qwest therefore does not understand KPMG's statement and needs additional detail regarding the specific issue if KPMG needs a more specific response.

KPMG Issue: *Qwest CR includes rate changes that are not explicitly defined to be within the scope of CMP.*

Qwest response:

The Qwest-initiated CR at issue here does not include rate changes. The purpose of the CR is to clarify that, if a CLEC chooses not to perform diagnostic testing to determine whether trouble resides within the CLEC's network, the CLEC may request that Qwest perform that testing on the CLEC's behalf. Under the process, a CLEC that asks Qwest to test on the CLEC's behalf also authorizes Qwest to charge the CLEC for performing that testing. Qwest proposed to use existing labor rates -- in CLEC interconnection agreements or the SGAT -- for performing the testing. Qwest also offered to enter into an amendment to interconnection agreements to specify the rate if a CLEC preferred to address the issue that way.

KPMG Consulting's First Response (01/07/02):

KPMG Consulting reviewed Qwest's response and found that the information presented differs in several ways from KPMG Consulting's understanding of the Interim Product/Process CMP. Qwest stated, in October 2001, that it would submit CRs for changes to products or processes that alter CLEC operating procedures, and that the Interim Product/Process CMP would govern all Qwest-initiated Product/Process CRs.⁵ KPMG Consulting attended the October 17, 2001 Product/Process CMP Meeting, and observed that Qwest planned to implement PC100101-5 sooner than the 45-day interval that the interim process specifies. CLECs expressly stated that this change would be CLEC-impacting.⁶

⁵ *Qwest Corporation's Report on the Status of Change Management Process Redesign before the Public Utilities Commission of the State of Colorado* dated October 10, 2001.

⁶ The draft meeting minutes of the October 17, 2001 Product/Process CMP meeting were included in the November 2001 Product/Process CMP distribution package located at <http://www.qwest.com/wholesale/downloads/2001/011112/ProductProcessNovDistPackage2.pdf>.

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KPMG Consulting observed that, on October 31, 2001, Qwest agreed to take the following action items:

- Regulatory:** Qwest would investigate whether or not the proposed CR would comply with Qwest's legal obligations, such as SGATs and Interconnection Agreements;
- Products:** Qwest would specify the products affected by the proposed CR;
- Documentation:** Qwest would provide CLECs with the revised PCAT language.

At the October 31, 2001 meeting, Qwest agreed to change the implementation date from November 19, 2001 to December 1, 2001. This change was made because Qwest planned to address important questions related to the above three topic areas at the follow-up meeting scheduled for November 26, 2001.

In response to CLEC objections, Qwest's legal and change management staffs stated, on November 29, 2001, that Qwest would investigate whether or not the implementation of this change would be suspended. As of December 1, 2001, however, Qwest had not provided CLECs with any status update regarding this CR. Based on information on the Qwest CMP Web site, it was unclear if CR PC100101-5 was going to be suspended, delayed a second time, or implemented on December 1, 2001. In response to a CLEC inquiry regarding the issue, Qwest formally informed CLECs, on December 4, 2001, that CR PC100101-5 had been executed on December 1, 2001, and advised the inquiring CLEC, through an email response, that interested parties should escalate the issue through the formal Change Management escalation procedure.

Based on the above events, KPMG Consulting provides a review each of the major issues included in this Exception:

1. *Following its responses to important regulatory, product, and documentation questions, Qwest allowed only four (4) business days for CLECs to prepare for the proposed change.*

Appendix A shows that the original CR form lacked specific information about the proposed change. As of October 31, 2001, Qwest had not provided CLECs with details or answers that addressed important regulatory, products, and documentation questions. In addition, KPMG Consulting observed that Qwest had not provided CLECs with draft PCAT documentation until November 8, 2001. In the absence of the above information and/or documentation, CLECs were unable to adequately prepare for the proposed change in advance of its implementation. Qwest's failure to conduct thorough research prior to initiating the CR necessitated follow-up investigations that increased the length of legal, regulatory, and operational discussions, thereby reducing the time allowed for CLECs to prepare for the proposed change. Based on the above observation, KPMG Consulting respectfully disagrees with Qwest's statement that CLECs had

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“more than six weeks” to make informed decisions and adapt to the proposed change.

2. *Qwest, through the CMP, did not provide adequate information to CLECs about a significant CLEC-impacting process change.*

KPMG Consulting observed that Qwest did not provide CLECs with adequate information in advance of the CR implementation. As shown in Appendix A, the original CR form, which CLECs expressly stated on October 17, 2001 would impact their business operations, lacked specific information about the proposed change. As of October 31, 2001, Qwest had not provided CLECs with details or answers that addressed important regulatory, product, and documentation questions. In addition, KPMG Consulting observed that Qwest had not provided CLECs with draft PCAT documentation until November 8, 2001, and a follow-up meeting did not take place until November 26, 2001, four days before the CR’s actual implementation. Qwest’s failure to provide information necessitated follow-up investigations that increased the length of legal, regulatory, and operational discussions, thereby not affording CLECs adequate time to prepare for the proposed change.

3. *Qwest, through the CMP, did not respond to input from all interested parties; a number of CLECs objected to Qwest’s implementation of this change and requested its immediate suspension.*

KPMG Consulting understands that CLECs have invoked the Escalation Process with regard to the CR in question. Nonetheless, since Qwest did submit a CR through the CMP, the fact that Qwest implemented the change – in spite of CLEC objections – indicates that, within the overall CMP framework, there is a lack of clarity between what Qwest defines as a CR, and a Qwest unilateral notification of process change. In addition, Qwest was unable to answer all CLEC inquiries at the additional meetings held to discuss this CR in more detail. At the November 29, 2001 meeting, it was still uncertain whether or not the change would be implemented on December 1, 2001.

4. *Qwest, through the CMP, did not update CR status on a timely basis.*

Qwest distributed SYST.11.30.01.F.02444_CEMR_UG_Update at 10:39 AM MST on **December 3, 2001** (see Appendix B). On November 29, 2001, Qwest legal and change management staff indicated that Qwest would investigate whether or not the CR would be suspended, but did not provide CLECs with the status update until December 4, 2001, three days after the change had gone into effect. As of December 1, 2001, the CR status report on the Qwest CMP Web site did not indicate if CR PC100101-5 was suspended or implemented.

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5. *Qwest CR includes rate changes that are not explicitly defined as within the scope of CMP.*

Qwest's response to this issue stated that the CR, itself, did not result in rate changes. However, the change in question is Qwest's implementation of a new testing process for Maintenance & Repair that results in Qwest's unilateral imposition of labor rates without CLEC agreement. The change potentially does have a significant financial impact on some CLECs. KPMG Consulting is aware that rate changes are not explicitly defined as within the scope of CMP, but would expect all Qwest-initiated CRs to follow the defined CMP Process.

KPMG Consulting did not observe Qwest's offer⁷ to enter into an amendment to interconnection agreements. KPMG Consulting reviewed the *Questions & Answers for Additional Testing 11/26/2001* document, and was unable to locate information to support Qwest's statement.⁸ Instead, KPMG Consulting observed that Qwest repeatedly stated in meetings that the CR was a clarification of existing requirements, thus making an amendment unnecessary. For instance, at the October 31, 2001 meeting, one CLEC asked if Qwest had checked all existing interconnection agreements to ensure that the CR was consistent with Qwest's legal obligations. Qwest replied, "yes," suggesting that no amendment was necessary.

KPMG Consulting recommends that this Exception remain open pending resolution of the above issues.

⁷ Qwest quote from December 21st response: "Qwest also offered to enter into an amendment to interconnection agreements to specify the rate if a CLEC preferred to address the issue that way."

⁸ *The Questions & Answers for Additional Testing 11/26/2001* document is located at http://www.qwest.com/wholesale/downloads/2001/011128/QA_CR_PC100101-5OptTesting112601.doc.

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Qwest OSS Evaluation

APPENDIX A

Co-Provider Change Request Form

Log # PCCR100101-5 Status: Submitted

Submitted By: Debra Smith

Date Submitted: 10/01/01

Co-Provider:

Internal Ref#

Submitter: Debra Smith, Qwest Unbundled Loop Product Manager, dssmith@qwest.com, 515-241-1206

Name, Title, and email/fax#/phone#

Proprietary for submission to Account Manager Only? Please check mark ☒ as appropriate

☐ Yes ☐ No

Title of Change:

Clarification of Additional Testing Process

Area of Change Request: Please check mark ☒ as appropriate and fill out the appropriate section below

☐ System ☐ Product ☒ Process

System Change Request Section

Interfaces Impacted: Please check mark ☒ as appropriate

☐ CEMR

☐ IMA EDI

☐ MEDIACC

☐ TELIS

☐ EXACT

☐ IMA GUI

☐ Product Database

☐ Wholesale Billing Interfaces

☐ HEET

☐ Directory Listings

☐ Other

Please describe

Description of Change:

Is new information requested in a specific screen or transaction?

☐ Yes ☐ No

If yes, name the screen or transaction:

Products Impacted: Please check mark ☒ as appropriate and also list specific products within product group, if applicable

☐ Centrex

☐ Resale

☐ Collocation

☐ SS7

☐ EEL (UNE-C)

☐ Switched Services

☐ Enterprise Data Services

☐ UDIT

☐ LIDB

☐ Unbundled Loop

☐ LIS

☐ UNE-P

☐ LNP

☐ Wireless

☐ Private Line

☐ Other

Please describe

Please describe

Known Dependencies:

Additional Information: (e.g., attachments for business specifications and/or requirements documents)

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Co-Provider Priority Level

☐ High ☐ Medium ☐ Low

Desired Implementation Date: ASAP- High

Product Change Request Section

Products Impacted: Please check mark ☒ all that apply (if "Other" please describe further)

- | | | | | |
|--------------------------------------------------|--------------------------------------|--------------------------------------------------|---------------------------------------------|---------------------------------|
| <input type="checkbox"/> LIS/Interconnection | <input type="checkbox"/> Collocation | <input type="checkbox"/> UNE | <input type="checkbox"/> Ancillary | <input type="checkbox"/> Resale |
| <input type="checkbox"/> EICT | <input type="checkbox"/> Physical | <input type="checkbox"/> Switching | <input type="checkbox"/> AIN | |
| <input type="checkbox"/> Tandem Trans./TST | <input type="checkbox"/> Virtual | <input type="checkbox"/> Transport (incl. EUDIT) | <input type="checkbox"/> DA | |
| <input type="checkbox"/> DTT/Dedicated Transport | <input type="checkbox"/> Adjacent | <input type="checkbox"/> Loop | <input type="checkbox"/> Operation Services | |
| <input type="checkbox"/> Tandem Switching | <input type="checkbox"/> ICDF Collo. | <input type="checkbox"/> UNE – P | <input type="checkbox"/> INP/LNP | |
| <input type="checkbox"/> Local Switching | <input type="checkbox"/> Other _____ | <input type="checkbox"/> EEL (UNE-C) | <input type="checkbox"/> Other _____ | |
| <input type="checkbox"/> Other _____ | | <input type="checkbox"/> UDF | | |
| | | <input type="checkbox"/> Other _____ | | |

Description of Change:

Known Dependencies:

Additional Information: (e.g., attachments for business specifications and/or requirements documents)

Co-Provider Priority Level

☐ High ☐ Medium ☐ Low

Desired Implementation Date: _____

Process Change Request Section

Area Impacted: Please check mark ☒ as appropriate

- ☐ Pre-Ordering
☐ Ordering
☐ Billing
☒ Repair ☐ Other _____

Please describe _____

Description of Change:

Currently, CLECs' are responsible for testing UNE's prior to submitting a trouble report to Qwest. CLECs' are to provide test diagnostics including specific evidence that the trouble is in the Qwest Network along with the associated Qwest circuit identification number. If the CLEC elects not to perform the necessary UNE testing, Qwest will offer to do such testing on CLECs' behalf. If such testing is requested by the CLEC, Qwest will perform the additional testing and bill the CLEC the appropriate charges that are in their Interconnection agreement.

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If the CLEC does not provide test diagnostics and elects not to have Qwest perform additional testing on their behalf, Qwest will not accept a trouble report. Additional Charges may apply when the testing determines the trouble is beyond the Loop Demarcation Point

This additional testing option is available on the Unbundled Loop Product Suite, Unbundled Dedicated Transport (UDIT), Enhanced Extended Loop (EEL) and Loop Mux.

Products Impacted: Please check mark ☒ as appropriate and also list specific products within product group, if applicable

☐ Centrex

☐ Collocation

X EEL (UNE-C)

☐ Enterprise Data Services

☐ LIDB

☐ LIS

☐ LNP

☐ Private Line

☐ Resale

☐ SS7

☐ Switched Services

X UDIT

X Unbundled Loop

☐ UNE-P

☐ Wireless

☐ Other

Please describe

Please describe

Known Dependencies:

Additional Information: (e.g., attachments for business specifications and/or requirements documents)

Co-Provider Priority Level

☐ High ☐ Medium ☐ Low

Desired Implementation Date: _____

This Section to be Completed by Qwest CICMP Manager

Qwest Account Manager Notification

Account Manager: _____ Notified: _____

Qwest CICMP Manager Clarification Request

☐ Yes ☐ No

If yes, clarification request sent: _____ Clarification received: _____

Co-Provider Industry Team Clarification Request

☐ Yes ☐ No

If yes, clarification request sent: _____ Clarification received: _____

Status, Evaluation and Implementation Comments:

10/01/01 – CR received by Deb Smith of Qwest

10/01/01 – CR status changed to Submitted

10/01/01 – Updated CR sent to Deb Smith

☐ Yes ☐ No

Candidate for a Release

If yes, Release Number: _____

EXHIBIT 9

OBSERVATION 3066 – FIRST RESPONSE

Qwest OSS Evaluation

Initial Release Date: December 12, 2001

First Supplemental Response Date: January 6, 2002

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Change Management Test, MTP Test 23.

Observation:

Qwest does not consistently employ the defined Change Management Process (CMP) to exclude CLEC-impacting system changes from point release versions of the Interconnect Mediated Access (IMA) interface.

Background:

IMA is a Qwest system that enables CLECs to access local telephone service elements of the Qwest network and Operations Support Systems. It automates the process by which Local Service Requests submitted by CLECs are used to create service orders.

Qwest has defined two types of IMA release implementations¹, with attributes as follows:

Major releases (e.g., IMA 8.0) –

- Add functionality to systems and processes;
- Scheduled three times per calendar year; and
- Changes are subject to the prioritization process.

Point releases (e.g., IMA 8.01) –

- Only concern back-end systems;
- Augment functionality disclosed in major releases; and
- Changes are not subject to the prioritization process.

In the context of the monthly CMP meeting and CMP Redesign Process, Qwest has stated that point releases do not require CLECs to make system or process changes². Unlike change requests that comprise major system releases, point release changes are not subject to the prioritization process.

¹ Refer to page three of the draft meeting minutes for Qwest's 10/30/2001-11/1/2001 CMP Redesign session. At that meeting, Jeff Thompson, Qwest's IT Director of ASR and Center Efficiency Processes, explained to CLEC participants the differences between a major release and a point release.

² See meeting minutes for Qwest's 10/16/2001 and 10/30/2001-11/1/2001 CMP Redesign working sessions, respectively, and meeting minutes for the 10/18/2001 Systems CMP Meeting at <http://www.qwest.com/wholesale/cmp/teammeetings.html>.

OBSERVATION 3066 – FIRST RESPONSE

Qwest OSS Evaluation

Issue:

Qwest does not consistently apply the defined CMP for CLEC-impacting system changes for point releases to the IMA interface. KPMG Consulting has observed at least two examples of point release changes that required, or would have required, a number of CLECs to make internal changes, such as employee training and process enhancements:

1. Qwest implemented changes to a backend database in IMA 6.01, and did not inform CLECs of the changes. This implementation resulted in CLECs' inability to process orders.³
2. A more recent instance involves Change Request (CR) 25152⁴ in IMA 8.01. Qwest presented this GUI-only change at the monthly Systems CMP meeting on October 18, 2001, and announced that the change would be implemented on November 19, 2001. Qwest removed this CR from IMA 8.01 in early November, after CLECs Allegiance, AT&T, and Eschelon raised concerns about this issue, stating that the CR was CLEC-impacting.⁵

Furthermore, it does not appear that clearly defined, documented Qwest processes or procedures exist to ensure that all CLEC-impacting IMA changes are identified and submitted for CLEC voting, as part of the prioritization process.

Impact:

The absence of a defined process for identifying CLEC-impacting changes, combined with inconsistent use of the documented CMP process, makes it difficult for CLECs to prepare for and respond to Qwest point releases. This exposes CLECs to unnecessary risks from changes that could impact their business operations and service to end-use customers.

Question:

What steps will Qwest take to ensure that CLEC-impacting systems changes are identified and communicated to CLECs through the CMP process?

Qwest Formal Response (12/20/01):

Qwest and the CLECs have already reached interim agreements on numerous processes associated with CLEC-impacting systems changes including those related to point

³ This issue led to the HP filing of Exception 2007.

⁴ CR#25152 "Enhancements for Appointment Scheduler" will require a CLEC to schedule an LSR appointment based on Qwest's resource availability.

⁵ See the meeting minutes for the 10/18/2001 Systems CMP Meeting and Action Item #366 in the 11/15/2001 Systems CMP Distribution Package at http://www.qwest.com/wholesale/downloads/2001/011109/November_15_Package.pdf.

OBSERVATION 3066 – FIRST RESPONSE

Qwest OSS Evaluation

releases. These agreements are documented in the *Master Redlined CLEC-Qwest CMP Re-design Framework – Revised 12-10-01*, <http://www.qwest.com/wholesale/cmp/redesign.html>, include:

- CR origination processes for Qwest and CLEC OSS Interface CRs
- Introduction of a New OSS Interface
- Changes to an Existing OSS Interface
- Retirement of an OSS Interface.

Qwest and the CLECs have agreed to implement these processes coincidentally with the implementation of the IMA 10.0 release in June 2002. Qwest and the CLECs will continue to collaboratively monitor and refine these processes through CMP.

Qwest and the CLECs are currently negotiating the *Qwest Proposed Prioritization Language* to document a process that will ensure that CLECs will have an opportunity to rank CLEC and Qwest submitted CRs. The Redesign Team is also negotiating provisions within the *Qwest Proposed Prioritization Language* to allow CLECs to prioritize Regulatory and Industry Guideline CRs, provided that the prioritization of these does not cause them to miss their mandated implementation dates. This language is scheduled for discussion at the January 22, 2002 CMP Re-design Meeting. Additionally, the Re-Design team continues to work toward collaboratively, and formally, addressing the definition of major and point releases.

To ensure that these agreed to processes are implemented quickly and effectively, Qwest is developing internal CMP training that is mandatory for Qwest IT personnel who work with systems that impact the CLECs.

KPMG Consulting's First Response (01/06/02):

KPMG Consulting reviewed Qwest's response and identified the following issues:

1. KPMG Consulting is aware of the ongoing CMP Redesign effort, but is unable to locate information in the *Master Redlined CLEC-Qwest CMP Re-design Framework* that indicates and explains how Qwest-initiated point-release changes are subject to the prioritization process. It is unclear how much information Qwest communicates to CLECs about point-release changes, and how Qwest systematically identifies all CLEC-impacting changes and submits them for CLEC voting, as part of the prioritization process.
2. KPMG Consulting requests that Qwest provide related documentation for validation and verification of CMP training for Qwest IT personnel.

KPMG Consulting recommends that this Observation remain open pending resolution of the above issues.

EXHIBIT 10

Doberneck, Megan

From: Powers, F. Lynne [flpowers@eschelon.com]
Sent: Saturday, December 08, 2001 1:09 AM
To: 'Mark Routh'; 'Judith Schultz'
Cc: Stichter, Kathleen L.; Johnson, Bonnie J.; Clauson, Karen L.; Terry Bahner; Liz Balvin; Jeff Bisgard; Clauson, Karen L.; Andrew Crain; Tom Dixon; Doberneck, Megan; Evans, Sandy; Filip, Dana; Gindlesberger, Larry; Green, Wendy; Gunderson, Peder; Hines, LeiLani; Hydock, Mike; Jennings-Fader, Mana; Lee, Judy; Littler, Bill; McDaniel, Paul; Lees, Marcia; Menezes, Mitch; Ellen Neis; Osborne-Miller, Donna; Powers, F. Lynne; Quintana, Becky; Rossi, Matt; Routh, Mark; Schultz, Judy; Stichter, Kathleen L.; Thiessen, Jim; Thompson, Jeffery; Travis, Susan; Priday, Tom; VanMeter, Sharon; Wagner, Lori M.; White, Matt; Wicks, Terry; Woodcock, Beth; Yeung, Shun (Sam); John Nicol; Teresa Jacobs; Gerald Mohatt; Christian Nobs; Zulevic, Michael; Ford, Laura; Kessler, Kim; Jim Maher
Subject: Event Notifications & Other Mailouts



Event Notification



Event Notification



FW: Copy of the
Notification o...

Mark & Judy,

Please find the attached Event Notifications. As you can see both of these are useless. One has nothing attached and the other informs of an IMA outage that occurred at 4:55 p.m. MT and the notice was received at 11:00

p.m. CT. I have also sent you many others that are similar. What is Qwest's plan to get these notifications and other distributions to CLEC's under control? In August, September timeframe we heard about a plan from

Judy & Jarby but it doesn't appear to be implemented.

<<Event Notification>> <<Event Notification>>

Also see another attached mailout that is useless. Recently, in our discussions with the Qwest ASMC (Repair) we were told that there was a recent work movement from one group to another that was made in October, 2001. In other words our calls to Qwest Repair began to be handled by a different group of people. This was a positive change from our perspective

because they are more knowledgeable people but it caused confusion in our center. We asked if Qwest could provide notice when these changes occur.

Nina Gable (Qwest) sent the attached to show me that notice was provided.

As you can see from the mailout, the notice was a) sent on the day of the change (not timely) and b) the notice said "When a CLEC reports trouble on a

Non Designed POTS service to the Wholesale Maintenance and Repair Center, the trouble may now be manually screened versus G4/SSM Auto screened in an

effort to better isolate the trouble." (I don't understand how anyone would

get the message that there was a change in the calls being answered by one

work force at Qwest to a more qualified workforce at Qwest).

<<FW: Copy of the Notification of Work Movement>>

Judy - please provide an update as to when we will see changes in Qwest communications to the CLEC's.

- > Lynne Powers
- > EVP of Customer Operations
- > Eschelon Telecom Inc.
- > flpowers@eschelon.com
- > (612) 436-6642
- > Fax: (612) 436-6742
- >
- >

Doberneck, Megan

From: Notification Wshd [wshd@qwest.com]
Sent: Friday, December 07, 2001 10:01 PM
Subject: Event Notification

EVENT NOTIFICATION

To: Qwest Wholesale Customers
From: Qwest IT Wholesale Systems Help Desk
Date: 12-07-2001
Subject: System Event Notification

☒ Initial Date/Time:
12/07/2001 16:55 MDT p.m.

☐ Update Date/Time:

☐ Initial Date/Time:

This Event Notification is sent to advise you that Qwest is experiencing trouble with the below system:

Ticket
Number: 5798272

IMA is inaccessible-SWAT team investigating problem

Event Onset

Time : 16:45
MTN

☐ AM ☒ PM

Date: 12/07/01

System/Application:

IMA-GUI	<input checked="" type="checkbox"/>
IMA-EDI	<input checked="" type="checkbox"/>
TELIS/EXACT	<input type="checkbox"/>
E-Commerce Gateway	<input checked="" type="checkbox"/>
CEMR	<input type="checkbox"/>
Resale Product Database	<input type="checkbox"/>
MEDIACC	<input type="checkbox"/>

Client Region:

Eastern	<input type="checkbox"/>
Central	<input type="checkbox"/>
Western	<input type="checkbox"/>
All Regions	<input checked="" type="checkbox"/>

Business Impact:

Event Closure

Time : MTN

☐ AM ☐ PM

Date:

☐ This System Event Notification has been closed.

Additional questions may be directed to the Qwest IT Wholesale Systems Help Desk at 1-888-796-9102, Option 3.

Doberneck, Megan

From: Powers, F. Lynne [flpowers@eschelon.com]
Sent: Wednesday, December 05, 2001 2:18 AM
To: Morrisette, Garth M.; Stichter, Kathleen L.; Walberg, Loren
Subject: FW: Copy of the Notification of Work Movement

I don't know about you guys but I am not sure that I would understand that
Qwest was changing the routing of our calls to a different work group from
this notice. Secondly, it was sent out so timely. Oct 12th with an Oct
12th implementation.

> -----Original Message-----

> From: Nina Gable [SMTP:ngable@qwest.com]
> Sent: Monday, December 03, 2001 9:07 AM
> To: flpowers@eschelon.com
> Cc: Stephen P Sheahan
> Subject: Copy of the Notification of Work Movement
>
> Lynne,
> In last month's call, Eschelon requested a copy of the work movement for
> Interconnect POTS repair call handling. Below is a copy of that
> notification,
> dated October 12th.
> Nina Gable
> Team Lead AMSC/CRSAB
> 719-444-9900
>
>
> October 12, 2001
>
> Dale Marton
> 1-800-Reconex Inc
> 2500 Industrial Ave
> Woodburn, OR 97032-
>
>
> To: Dale Marton
>
> Announcement Date: October 12, 2001
> Effective Date: October 12, 2001
> Document Number: PROS.10.11.01.F.00132.Repair_ManualScreening
> Notification Category: Process
> Target Audience: CLEC and Resale
> Subject: Updated Process Information for Manual Screening
> During the Repair Process
>
>
> Beginning October 12, 2001, Qwest will issue updates to its Wholesale
> Product Catalog that includes new/revised documentation regarding the
> Repair
> process for Non-Designed Services.
>

> When a CLEC reports trouble on a Non Designed POTS service to the
> Wholesale Maintenance and Repair Center, the trouble may now be
manually
> screened versus G4/SSM Auto screened in an effort to better isolate
the
> trouble.
>
> You will find a summary of these updates on the attached Web Change
> Notification Form. Actual updates are found on the Qwest Wholesale Web
> site at this URL:
<http://www.qwest.com/wholesale/clecs/maintenance.html>
>
> You are encouraged to provide feedback to this notice through our web
> site. We provide an easy to use
> feedback form at <http://www.qwest.com/wholesale/feedback.html>. A Qwest
> representative will contact you shortly
> to discuss your suggestion.
>
>
> If you have any questions or would like to discuss this notice please
> contact your
> Qwest Sales Executive, John Seyler on 206-345-8659 or your Qwest
Service
> Manager, Dione Salomonson on 3038969502. Qwest appreciates your
business
> and
> we look forward to our continued relationship.
>
> Sincerely,
>
>
> Qwest
>
> Note: While these updates reflect current practice, it is important to
> note that
> there are additional changes that will be forthcoming as a result of
> ongoing
> regulatory activities e.g., collaborative workshops, and state
commission
> orders.
> As these changes are defined and implementation dates are determined,
> notice of
> additional updates will be provided accordingly.
>
> The Qwest Wholesale Web Site provides a comprehensive catalog of
detailed
> information on Qwest products and services including specific
descriptions
> on
> doing business with Qwest. All information provided on the site
describes
> current
> activities and process.
>
> Prior to any modifications to existing activities or processes
described
> on the web
> site, wholesale customers will receive written notification announcing
the
> upcoming
> change.
>
>
> cc: John Seyler
> Dione Salomonson

EXHIBIT 11

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN

Revised—December 11, 2001

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
13G	Action	August 8 Meeting	CMP Web Site	Re-visit the redlined CMP framework element, "Qwest Wholesale CMP Web Site" at a later working session.	Core Team	Sep-20 Extended to Nov-13 Nov-27-29 TBD	Re-visit this element to insure all items are addressed in the re-designed CMP framework.
40	Issue	August 14 Meeting	Notifications	Are Call Center outages included in the "outages" sub-category -- should they be?	Qwest – Judy Schultz	Sep-5 Extended to Sep-20 Oct-15 Nov-1 Nov-13 Nov-27-29 Dec-10-11 TBD	Qwest will provide notice on the process via mail-out 10/29: Posted on CMP Redesign web site—"Qwest Center Outage Notification Process-Posted 10-29-01" 11/29: Terry Bahner/ATT to review and core team to close at next session.
42	Action	August 14 Meeting	Notification	Investigate how notifications are done for Network outages, including a paging broadcast capability. 9/5: Does the SGAT language pertaining to method of notification for Network outages need to be revised based on Qwest practice?	Qwest – Jim Maher Andy Crain	Sep-6 Extended to Sep-18 Sep-20 Oct-2, 16 Nov-1, 13 Nov-27-29 Dec 10-11 TBD	Related to Item #66 Beth Woodcock to contact Andy Crain to provide information at the Oct-30-Nov-1 next session. 11/29: Andy Crain to clarify at next session. Jim Maher to confirm paging process for Network Outages.
68	Action	Sep 6 Meeting	271 Workshop 18 COIL Items	Review the 18 items and verify that they will be addressed in the CMP re-design	Core Team	On-going	See Item #176
69	Action	Sep 6 Meeting	Qwest Status Report	Review redlined document and Qwest status report prior to scheduled filing. 9/18: Qwest to provide documents to participants no later than Sep 27 for review. 10/2: Qwest will continue to provide	Core Team	On-going	COMPLETED: Andy Crain to distribute documents no later than Sep 27 for re-design team review prior to Oct 2 meeting. Will visit at each meeting. Qwest will update filing status at Dec 10 th meeting.

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log--OPEN

Revised--December 11, 2001

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
				documents to redesign team for review prior to filings. 12/11 Provide dates for Jan and Feb filing dates	Andy Crain		
70	Issue	Sep 6 Meeting	CLEC Review of Tech Pubs and PCAT Changes	What is Qwest's proposal for CLECs to review and provide comments to notices on Tech Pub and PCAT changes -- what is the role of the CMP group (monthly) in these proposed changes? 10/16: Issue remains open until the interim process is implemented.	Qwest -- Judy Schultz	Sep-18 Extended Sep-20 Oct-2-3 Oct-16 Until Deployed	Susie Bliss will provide overview of the process at the Sep 19 CMP product/process meeting. Defer until discussion on Scope is scheduled. Scheduled call on October 5 -- Susie Bliss. Minutes posted to Redesign website 10-29-01
88	Action	Sep 18 Meeting	CMP Process	Propose language for "proprietary CR"	Core Team	Sep-20 Extended Oct-3,-16 Nov-1 TBD	Related to #89
89	Issue	Sep 18 Meeting	CMP Process	What is the process for a CLEC-originated CR deemed proprietary and a process to handle proprietary CLEC questions and comments?	Core Team	Oct-3 Extended Oct-16 Nov-1 TBD	Related to #88 Issue reworded on Oct 30 to address proprietary CLEC questions and comments.
93	Action	Sep 18 Meeting	Exception Process	What is the process for an Exception item during prioritization?	Core Team	Sep-20 Extended Nov-1 TBD	
94	Issue	Sep 20 Meeting	CR Process	How will the CR Process address 'draft' industry guideline changes?	Core Team	Oct-3 Extended Oct-16 Nov-1 TBD	

CLEC-Qwest Change Management Re-design Working Sessions **Core Team Issues/Action Items Log—OPEN**

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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
100	Action	Sep 20 Meeting	Schedule Working Sessions	Determine the elements for CMP Product/Process	Core Team	Oct-16 Extended Nov-13 TBD	Related to #176 Core Team to do some pre-meeting work to determine additional elements for Product/Process.
104	Action	Oct 2 Meeting (Meagan – Covad)	Parity in changes	Who has responsibility for determining whether or not a change in retail is CLEC impacting and requires notification via the CMP process	Qwest – Judy Schultz	Oct-16 Extended Nov-13 Nov-27-29 Dec-10-11 TBD	Related to #105—to be closed after Core Team reviews sample retail mail- outs. 11/29: Need to review Mitch/AT&T questions on insuring parity between retail and wholesale. Add to agenda for the Dec-10-11 next session.
105		Oct 2 Meeting (Dixon – WCom)	Parity	Provide training package and check list used by Qwest to train retail in identifying changes that impact CLECs Provide sample mail outs for retail changes – (Retail only change and Retail CLEC impacting change) Code of Conduct – what is the disciplinary action when guidelines – (includes compliance) are not adhered to	Qwest – Judy Schultz	Oct-16 Extended Nov-13 Nov-27-29 Dec-10-11 TBD	This is replaces # 95; related #104 Option 1 – Qwest sends everything Option 2 – Qwest screens notification to only CLEC impacting changes 10/16 COMPLETED: This checklist is on the web on the CMP re-design web site under Re-Design documentation 11/1: Examples of mail outs for retail changes are posted on the web site and shared as hand-out at the 11/13 session. 11/29: Need to review Mitch/AT&T questions on insuring parity between retail and wholesale. Add to agenda for the Dec-10-11 next session.
106	Action	Oct 2 Meeting	Definition of terms	Define terms used in Paragraph 2 in the body of the document (scope and introduction) and in the glossary of terms table on page 41 of the Master Red lined document. What is OBF's definition?	Core Team	Ongoing	Terms: Design, Development, Notification, Testing, Implementation and Disposition

**CLEC-Qwest Change Management Re-design Working Sessions
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Revised—December 11, 2001

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
107	Action	Oct 2 Meeting	Scope—Roles and Respon.	Define "Roles and Responsibilities" of Qwest and CLEC representative/s as it appears on Paragraph 3 of the Scope 11/1: Define responsibility for a primary and secondary POC and a CMP Team Representative.	Core Team	Nov-4 TBD	Reference language under Administration per OBF structure, or Managing the CMP
108	Action	Oct 2 Meeting	PCAT—Tech Pub Notification	Research tech pubs and PCAT changes that have been released thus far as they relate to 271 workshop commitments. Provide a list of notifications that are to be released 10/16: Can Qwest improve the delivery timeframe for previously released changes to PCAT and Tech Pubs? 11/29: Do the CLECs still want Qwest to do retroactive red lining? Is Qwest able to do retroactive red lining on Tech Pubs?	Qwest— Judy Schultz	Oct-16 Extended Nov-4 Nov-13 Dec-10-11 TBD	Also present at the Oct 17 CMP Product/Process meeting 10/16: Already released PCAT changes will be highlighted in Green and will be available March 2002 (estimated 3 months of work).
110	Action	Oct 3 Meeting	Terms: CLEC Operating Procedures	Define "CLEC operating procedures" under Terms table in master redline document. 11/1: Subcommittee will provide the Core Team with an expanded definition for CLEC impacting besides the current 4 items.	Qwest— Andy Crain (Susie Bliss) Core Team Sub- Comm- Core Team	Oct-16 On-going Nov-13 Nov-27-29 TBD	Will be discussed offline on Oct 5 -- Susie Bliss (develop checklist) 10/16: Define the term "operating procedures" at a later session. 11/1: Subcommittee (Judy Schultz, Terry Bahner, Terry Wicks, Liz Balvin, Karen Clausen) to present at the 11/13 meeting expanded list of CLEC impacting situations. Related to #137

CLEC-Qwest Change Management Re-design Working Sessions
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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
115	Action	Oct 3 Meeting	SGAT Language	Revisit proposed SGAT language at the conclusion of the Re-Design process.	Core Team	On-going	
116	Issue	Oct 3 Meeting	New Product Offerings	Are new product offerings brought to CMP as a Change Request?	Core Team	TBD	Will address later during CMP discussion on Product/Process.
118	Action	Oct 3 Meeting	Criteria for Deny	State the criteria for Deny (reasons why) for the CR process.	Qwest— Judy Schultz	Oct-16 Extended Nov-4 Nov-13 Dec-10-11 TBD	Criteria examples: Specific regulatory ruling Qwest Policy Business (e.g., Cost)
126	Issue	Oct 16 Meeting	Exception Process	What process allows CRs to be submitted less than the agreed upon timeframe for CR presentation at the upcoming CMP meeting? Will the Exception Process accommodate this situation?	Core Team	Nov-4 TBD	Language for the Exception Process and/or CR Initiation Process.
133	Issue	Oct 16 Meeting	Terms	Define "major" and "point" OSS interface releases.	Core Team	On-going	Defined under Terms o Release – Major – Point 11/29: Point release was defined. Major release needs additional work. Define "Release" as well.
137	Issue	Oct 30 Meeting	Terms	Define Changes to the OSS interfaces that may not require a CLEC to make coding changes but may affect CLEC process or operations.	Core Team	On-going	Related to #110-subcommittee to expand definition 11/29: Do a search in the Master Red Line for "Code" and/or "Non-coding"

CLEC-Qwest Change Management Re-design Working Sessions
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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
							to determine whether a process is needed to address non-coding changes. Non-coding changes may not require a CLEC to make coding changes but may affect CLEC operations or processes.
139	Action	Oct 30 Meeting	Change to An Existing OSS Interface	Propose language for maximum number of major releases for OSS interfaces, other than IMA.	Qwest— Jeff Thompson	Nov-13 TBD	
140	Action	Oct 30 Meeting	Note	Reword "note" to accommodate weekends and holidays on all timelines as attachments to the OSS Interface elements. 11/29: Qwest to evaluate if the timelines should be in business days or calendar days.	Qwest— Judy Schultz	Nov-13 Extended TBD	Elements: <ul style="list-style-type: none"> • Change to An Existing OSS Interface • Introduction of a New OSS Interface • Retirement of an Existing OSS Interface
141	Action	Oct 30 Meeting	Change to An Existing OSS Interface	Define what will be included in the Technical Specifications.	Qwest— Jeff Thompson	Nov-13 Extended TBD	Qwest readiness to include the following language in the Master Redlined Framework and this close issue: The technical specifications include: <ul style="list-style-type: none"> • A chapter for each transaction or product which includes a business (OBF forms to use) description, a business model (electronic transactions needed to complete a business function), trading partner access information, mapping examples, data dictionary Appendices include: <ul style="list-style-type: none"> • Developer Worksheets

CLEC-Qwest Change Management Re-design Working Sessions
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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
							<ul style="list-style-type: none"> • IMA Additional Edits (edits from backend OSS systems) • Develop Worksheets Change Summary (field by field, release by release changes) • EDI Mapping and Code Conversion Changes (release by release changes) • Facility Based Directory Listings • Generic Order Flow Business Model
142	Issue	Oct 30 Meeting	Change to An Existing OSS Interface	Does the team agree that the CR Initiation Process and Prioritization Process have taken place before a change is implemented according to the Changes to an Existing OSS Interface Process? 12-11-01 Clarify in the Master Redline that CRs precede any changes within the scope of CMP (exceptions?, production support?) (AT&T item # 14)	Core Team	Nov-13 Extended Nov-27-29 TBD	Qwest stated that Industry Guideline and Regulatory changes will not be prioritized, but a CR will be shared with CLECs at the Systems CMP Meeting.
143	Issue	Oct 30 Meeting	EDI Implem. Guideline	Is the EDI Implementation Guideline under the scope of CMP?	Qwest—Judy Schultz	Nov-13 Extended Nov-27-29 TBD	
145	Issue	Oct 30 Meeting	OSS Interface CR Initiation	CLEC comments and Qwest responses should be communicated to CLECs. Create a method to communicate via web site.	Qwest—Judy Schultz	Nov-13 Extended Nov-27-29 TBD	

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN**

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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
146	Issue	Oct 30 Meeting	OSS Interface CR Initiation	What are the criteria used to determine 'level of effort' (i.e., S, M, L, XL) for a release?	Qwest— Jeff Thompson	Nov-13 Extended Nov-27-29 TBD	
148	Issue	Oct 30 Meeting	OSS Interface CR Initiation	Specify/clarify process for Qwest-initiated CRs on page 1 of proposed Qwest language document.	Qwest— Judy Schultz	Nov-13 Extended Nov-27-29 TBD	
149	Issue	Oct 30 Meeting	New OSS Interface CR	Is a CR required for a new OSS interface? And would it go through the Prioritization/Ranking process?	Core Team	Nov-13 Extended Nov-27-29 TBD	
150	Issue	Oct 31 Meeting	Prioritization	Is prioritization on a per OSS interface basis?	Qwest— Jeff Thompson	Nov-13 Extended Nov-27-29 TBD	
151	Issue	Oct 31 Meeting	Redesign Core Team Expectations/ Respons.	Define level of participation for the CMP Redesign effort. In addition, provide language addressing preparedness for each working session.	Core Team Sub- committee	Nov-13 Extended Nov-27-29 TBD	Subcommittee: <u>Leilani Hines</u> , Sharon Van Meter, Terry Wicks 11/7: Proposed language already posted on 11/9, and ready to discuss with Core Team at a future session.
152	Issue	Oct 31 Meeting	Training	When is Training available when a new GUI is introduced (after the Release Production Date, or is it available with the Final Notice and User Guide)?	Qwest— Judy Schultz	TBD	To be addressed during Training element discussion. 11/1: Ready to close with Core Team—Training will be available with the Final notice is issued by Qwest.
153	Issue	Oct 31 Meeting	Timelines	Do we need to include language that the timelines under the CMP master	Core Team	Nov-13 Extended	

CLEC-Qwest Change Management Re-design Working Sessions **Core Team Issues/Action Items Log—OPEN**

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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
				redlined are 'defaults'? If so, what is the language to address all timelines such as New/Retired OSS Interface?		Nov-27-29 TBD	
156	Issue	Oct 31 Meeting	Admin— Notification Methods	Clarify what notices will be communicated to CLECs via email, mail-outs, communiqués, and posted on the web site.	Qwest— Judy Schultz	Nov-13 Extended Nov-27-29 TBD	Language: Administration
158	Action	Nov 1 Meeting	CPAP/PID	What is the process to manage changes to performance reporting, calculation, etc.? How do we handle the overlaps between what is being negotiated at the CMP Redesign and CPAP-like procedures? 11/1: Status at the 11/13 CMP redesign session.	Core Team	Nov-13 Extended Nov-27-29 TBD	CO PUC expected to issued order on Nov 5. 11/13: Becky/CO PUC provided the Team with an overview of the order.
162	Action	Nov 1 Meeting	Terms	Define "CLEC", "Qwest" and "sub-systems"	Core Team	TBD	
163	Issue	Nov 1 Meeting	CR Process	Where will a CR that impacts both an OSS interface and process be addressed—at the Systems or Product/Process CMP Meeting? We will need to develop language to address this issue.	Core Team	Nov-13 Extended Nov-27-29 TBD	Language: Administration or CR Initiation Process
167	Issue	Nov 1 Meeting	Prioritization for Regulatory Change	Can Qwest revisit its position on not including Regulatory mandated changes in the Prioritization Process? CLECs understand that Qwest still opt to meet the timeline for compliance.	Qwest— Judy Schultz	Nov-13 Extended Nov-27-29 Dec-10-11 TBD	Discussion held on 11/13, but Qwest needs more time to consider CLECs comments. To be re-addressed at the next session.
168	Issue	Nov 1 Meeting	Prioritization for Industry	Will Qwest change its position to allow Industry Guideline changes to	Qwest— Judy	Nov-13 Extended	Discussion held on 11/13, but Qwest needs more time to consider CLECs

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN

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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
			Guideline Change	be prioritized through the Prioritization Process. If so, provide language to include Industry Guideline changes as part of the Prioritization Process. Suggested language: Qwest needs to be able to meet timelines where dates are mandated at industry bodies.	Schultz	Nov-27-29 Dec-10-11 TBD	comments. To be re-addressed at the next session.
169	Issue	Nov 1 Meeting	Regulatory Type of Changes	Qwest proposes to re-visit Regulatory type of change to address performance measure obligations.	Qwest— Judy Schultz	Nov-13 Extended Nov-27-29 Dec-10-11 TBD	Discussion held on 11/13, but Qwest needs more time to consider CLECs comments to not modify existing definition. Qwest to provide position after considering CLECs comments at the next session.
170	Issue	Nov 1 Meeting	CLEC-Initiated PID Change	Will Qwest consider: <ul style="list-style-type: none"> a performance improvement or PIDs subject to the PAP as a Regulatory change? a CLEC-initiated performance improvement change not subject to PAP as a Regulatory change? 	Qwest— Judy Schultz	Nov-13 Extended Nov-27-29 TBD	
171	Issue	Nov 1 Meeting Nov 28 Meeting	IMA 10.0 Changes	What is the rationale for six (6) IMA 10.0 changes to be treated as Regulatory changes? <hr/> Provide the details for CRs for the 5 remaining "regulatory" CRs on the IMA 10.0 list. Include supporting documentation (site the FCC order).	Qwest— Mark Routh	Nov-9 Extended Nov-19 Dec-10-11 TBD	11/19 meeting to discuss rationale. Qwest to email material and post on the web site by 11/14. 11/30: Qwest to provide details on the CRs.
172	Issue	Nov 1 Meeting	Roles and Respons.	Review "Managing of CMP" proposal to include overall	Core Team	TBD	Language: Managing the CMP

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN

Revised—December 11, 2001

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
				responsibilities; e.g., Qwest issues prioritization list and CLECs prioritize.			
173	Issue	Nov 1 Meeting	Voting Process	Develop the Voting Process.	Core Team	TBD	
174	Action	Nov 1 Meeting	Prioritization Documents	Attach the latest Ranking Form, sample of a Release Candidate List and compilation/tabulation form to the Prioritization section of the master redline.	Qwest— Mark Routh	Nov 13 Extended Nov 27-29 TBD	Master Redline—Prioritization Process attachments
175	Action	Oct 31 Meeting	Core Team Membership	Contact those CLECs that are now dropped as a Core Team member, but may re-active their membership status.	Judy Lee	Nov 13 Extended Nov 27-29 TBD	10/31: Rhythms and Scindo will no longer participate. 11/6: Emailed Electric Lightwave, Integra, McLeodUSA, Premier and XO. Contact information not available for Level 3. Integra wants to be a member; McLeod will no longer participate. Premier will continue as a participant.
176	Action	Nov 13 Meeting	OSS Elements	Review and compare CMP red lined document to all other related documents (i.e. 18 point, OBF 2233, open issues log, CLEC issues etc.) to ensure completeness of the proposed Qwest CMP Process and make any changes that may be necessary. Identify additional for OSS Interface, Product/Process and overall elements.	Core Team	Jan 11	By Jan 11 Noon Mountain time: Every Core Team member and participant to provide results of review and compare document to Jim Maher. By Jan 18: Jim Maher to send a compilation matrix with CLEC-Qwest-Lee input to the Core Team. Individual Team documents will also be shared with the team.
177	Action	Nov 13 Meeting	CMP Implem.	Draft a proposal for a formal implementation of the interim and final changes discussed within the CMP Re-Design to be discussed during the monthly CMP meetings.	Qwest— Judy Schultz	Nov 27-29 TBD	Related to #178

CLEC-Qwest Change Management Re-design Working Sessions
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Revised—December 11, 2001

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
178	Action	Nov 13 Meeting	CMP Implem	Clarify what has been agreed upon for the implementation of an interim process.	Core Team	Nov-27-29 TBD	Related to #177
179	Action	Nov 13 Meeting	Product/ Process Interim CMP	What is CLEC impacting?	Core team	Nov-27-29 TBD	Refer to action #110
180	Action	Nov 13 Meeting	Product/ Process Interim CMP process	What is covered under the interim process for Product/Process (i.e., Additional Testing) in terms of Qwest initiated and Regulatory changes	Qwest— Judy Schultz	Nov-27-29 TBD	
181	Issue	Nov 13 Meeting	OSS CR Prioritization Regulatory Changes	Qwest to revisit language for the definition of a Regulatory change, and the proposed prioritization process as it relates to these. Qwest asks CLECs to draft proposed language for Regulatory Changes as it is written in the Red lined document to include PID/PAP scenarios. 11/13: Qwest to consider the position of CLECs on the need to prioritize Regulatory CRs and provide its final position at the next session.	Qwest	Nov-27-29 Dec-10-11 TBD	Prioritize all (excludes production support), provide for agreed upon mandatory/industry dates, allow exception, escalation and dispute resolution procedures to be invoked as necessary. (CLEC request) CLECs agree with language for regulatory changes as it is written in the red lined document Prioritization section has to include criteria around how to rank CRs.
182	Action	Nov 13 Meeting	Terms	Define migration testing and new release testing, and Regression Testing, Controlled Production Testing, Interoperability Testing, SATF in the "terms" section of the red lined document.	Qwest— Jeff Thompson	Ongoing	Review SGAT and EDI Implementation Guideline for language.

CLIEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log--OPEN

Revised--December 11, 2001

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
183	Action	Nov 13 Meeting	CMP Gaps	Judy Lee to compare and report any gaps in mapping red-lined document to OBF 2233	Judy Lee	Dec-10-11 Extended to Jan 11	Related to #176 Include as part of Core Team matrix for Jan 22-24 session.
184	Action	Nov 13 Meeting	Issues/Action Items Log	Clarify issues and action items to better capture what the item is. Discussion that does not flush out sufficient detail should be confirmed in the appropriate meeting minutes	Core Team	Nov-27-29 Dec-10-11 On-going	Began reviewing Issues/Action Items Log for understanding and status. Will continue at next session.
186	Action	Nov 27 Meeting 12/10 Meeting	Test Scenarios	Are test scenarios provided separately from Tech. Specs or included? (include in Changes to Existing OSS Interfaces section and Application to Application Interface Testing Section) 12/11: Review proposed certification/re-certification language at the next working session.	Qwest-- Teresa Jacobs Andy Crain	Dec-10-11 TBD	Qwest is ready to include the following language in the Master Redlined Framework and to close this item. A re-certification notification is sent 5 weeks prior to the release, which outlines the transactions and activity types, which have changed in the new release and should be retested. This is sent via the normal CMP notification process. 12/10: Andy Crain to clarify section I.1 (pg 61) of the Red Lined document for the 12/11 meeting. 12/11: Andy Crain provided proposed language for certification/re-certification for the Team to review at the next working session.
187	Issue	Nov 27 Meeting	AT&T issues list	#9 from AT&T issues list (including differences due to geography and systems). 12/11 #9a from AT&T issues: define the requirements for establishing a point of contact for CMP related	Qwest-- Judy Schultz	Dec-10-11 TBD	--

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN**

Revised—December 11, 2001

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
				issues that are not followed within Qwest. (CMP help desk?)			
189	Action	Nov 27 Meeting	Escalation Process	Draft proposal(s) for an escalation process for technical production problems for both CLECs and Qwest. 12/11: The team should determine how to notify the CLECs that a trouble ticket has been escalated.	Qwest— Teresa Jacobs	Dec-10-11 TBD	Defining escalation candidates/triggers, criteria, initiators, escalation agents/people who will receive the escalation, escalation contacts, methods, communication feedback & follow up, how to keep lists current, implementation plan. Initial draft planned for 12/17. CLECs will be solicited starting week of 12/17. Will bring language to Jan. redesign meeting.
193	Action	Nov 28 Meeting	IMA 10.0 prioritization	Send out an email to the Core Team that discusses the affinity between 25001 and 30623.	Qwest— Jeff Thompson	Dec-10-11 TBD	Teresa will call the following for input: Leilani Hines - WorldCom Terry Bahner – AT&T Karen Clauson - Eschelon Jeff Thompson's response was distributed on Wed. December 5, 2001
194	Action	Nov 28 Meeting	IMA 10.0 prioritization	Provide an explanation as well as supporting regulatory document/s as to why the Number Pooling CR #30831 must be done in order for the system to continue to perform properly.	Qwest— Jeff Thompson	Nov-30 TBD	Jeff Thompson's response was distributed on Wed. December 5, 2001
195	Action	Nov 28 Meeting	Post 10.0 PID/PAP CRs	Provide the CRs (information) for PID/PAP changes for which Qwest would want an exception to the CMP prioritization process. 12-11-01 Included what the system	Qwest— Teresa Jacobs	Dec-10-11 TBD	Qwest ready to discuss and close item. The following 10.0 candidates have been defined: CR #30623 On-time jeopardy notification improvements

CLLEC-Qwest Change Management Re-design Working Sessions
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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
				changes will be and how it will provide the performance improvement.			CR #25379 Enhancement to accept and format orders for LSR re-requests with ACT=T for Unbundled Loop. CR #25381 Reject requests for conversion from Remote Call Forward for UBL.
196	Action	Nov 28 Meeting	Prioritization	Provide a decision on whether to provide copies of documentation regarding prioritization and sizing.	Qwest-Teresa Jacobs	Dec-10-11 TBD	Qwest ready to close this item. The CLIECs can refer to the attached "CMP CR Work Flow for OSS Interfaces" document on the CMP Redesign web site (language already incorporated into the Master Redlined framework in narrative format) for an overview of the processes used for releases.
197	Action	Nov 28 Meeting	Prioritization	Provide the end-to-end development life cycle and time interval for each milestone for systems and Product & Process CRs. 12-11-10 Provide best case scenarios for stand alone product & process, systems; most likely scenarios for systems and factors that could contribute to longer implementation time frames for Product & Process. Address the process, if any, for declining a CR for reason such as scope.(within first 2 business days after receiving the CR)	Qwest-Teresa Jacobs Judy Schultz	TBD	The "IMA Release Timeline/Milestone" will be available by the next redesign session. This timeline will provide an overview of Qwest's development cycle for further discussion on Prioritization.
198	Action	Nov 29	Not CLIEC	Send an email to Product and Process	Qwest---	CLOSED	Judy Schultz to share the memo with

**CLIEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log--OPEN**

Revised--December 11, 2001

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
		Meeting	Impacting Product/ Process	employees regarding how to handle changes for the next two weeks.	Judy Schultz	Dec 11	the Core Team
199	Action	Nov 29 Meeting	Documentation Version Number	Verify that the version number is on the document. (CLECs want the Version # at the front of the document.)	Qwest-- Judy Schultz (Kim K.)	Dec-10-11 TBD	Qwest will implement Version numbering on the top of the documents as they are published. Keep Action Item open until implemented.
200	Action	Nov 29 Meeting	Documentation Version Control Tools	Review existing Documentation Version Control tools to see if one will fulfill the CMP needs.	Qwest-- Mark Routh	Dec-10-11 TBD	
201	Action	Nov 29 Meeting	Documentation	Meet with the Documentation team regarding holding tank and operational versions. Discuss how the history log will work with the holding tank documents.	Qwest-- Judy Schultz (Kim K.)	Dec-10-11 TBD	
202	Action	Nov 29 Meeting	Documentation	Update the Documentation History Log	Qwest-- Judy Schultz (Kim K.)	Dec-10-11 TBD	
203	Action	Nov 29 Meeting	Documentation	With the Historical log there will be a separate log for the PCAT Topical section (drop down list).	Qwest-- Judy Schultz (Kim K.)	Dec-10-11 TBD	
204	Issue	Nov 29 Meeting	Documentation	How will Qwest insure that the dot changes and holding tank changes get updated on the operational version?	Qwest-- Judy Schultz (Kim K.)	Dec-10-11 TBD	
205	Action	Dec 10 Meeting	Notification	Capture Event Notification channels for CLECs and Communicate back to	Qwest-- Jeff	Dec-10-11 TBD	

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN**

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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
				the CMP redesign team. Identify document with Event Notification subscription process.	Thompson		
206	Action	Dec 10 Meeting	Notification	To insure appropriate Qwest personnel to receive the same event notifications in the same time frames as CLECs	Qwest— Judy Schultz	TBD	
207	Action	Dec 10 Meeting	IT Help Desk	Investigate IT Help Desk VRU to clarify option #3. Verify that Option #1 will prompt an ISC ticket	Qwest— Teresa Jacobs	TBD	
208	Action	Dec 11 Meeting	Interface Testing (Non-production problems)	Add language in the Interface Testing section (?) to address the issue about finding a bug in the production code in the test environment: Process for addressing Non-Production support problems that arise in interface testing.	Qwest— Andy Crain	Jan 22-24	Language provided by Andy Crain to Core Team for discussion at next session.
209	Action	Dec 11 Meeting	Scheduled OSS Interface Maintenance	Propose language and time frame for scheduled maintenance. Notification and inclusion of known patches or any other known CLEC impacting changes. Whether scheduled maintenance. Included under production support or in another section in the Red Line Document.	Qwest— Teresa Jacobs	TBD	
210	Action	Dec 11 Meeting	Production Support Implementation Date	Determine implementation date for Production Support process.	Qwest— Teresa Jacobs	TBD	

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN**

Revised —December 11, 2001

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
211	Action	Dec 11 Meeting	Production Support	Production support CMP recommendations with a written list of changes from current process. Provide Severity 1 – 4 trouble tickets that are logged in the IT help desk system, and remain unresolved. Examples will be provided reflecting the format of the proposed implementation.	Qwest— Teresa Jacobs	TBD	To be provided in the January Systems CMP distribution package and to be presented and discussed at the January meeting. Seek approval from the CLEC community for an interim test phase.
212	Action	Dec 11 Meeting	CR Initiation	Review AT&T proposal (and draft language) that: For regulatory or industry change CRs, originator of CR must provide specific information in the CR identifying what makes the CR a regulatory change or industry guideline change. Such information must include specific references to regulatory or court orders, legislation, industry guidelines as well as dates, docket or case number, page numbers and the mandatory implementation date, if any.	Qwest— Andy Crain	TBD	
213	Action	Dec 11 Meeting	CR Initiation Type of Change	Need a process to debate whether a change fits as a regulatory or industry guideline change. With the information in 3a., CLECs will be informed to have this debate (ATT Issues List).	Core Team	TBD	
214	Action	Dec 11 Meeting	CR Initiation Level of Effort	Review the CR initiation process to insure that the description of the output of each step of the process is clearly defined; i.e., LOE (in range of	Qwest— Andy Crain /Core Team	TBD	

CLEC-Qwest Change Management Re-design Working Sessions **Core Team Issues/Action Items Log—OPEN**

Revised—December 11, 2001

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
				hours) and affinity			
215		Dec 11 Meeting	Exception Process	Develop proposed language for exception process for the core team to review.	Qwest— Judy Schultz	TBD	
216	Action	Dec 11 Meeting	Issue Management	Qwest to outline what the guidelines are for when an issue is appropriate for the CMP vs. when the Account team should handle it.	Qwest— Judy Schultz	TBD	
217	Action	Dec 11 Meeting	Addendum Documentation and Software	Qwest to develop language regarding addenda to release software and documentation. How is it done? How is it communicated? How is it documented? Are CLECs ever consulted?	Qwest— Jeff Thompson	TBD	
218	Issue	Dec 11 Meeting	Qwest Initiated Product/ Process CR	Revisit Qwest initiated Product/Process change process. There is an issue around its use after redesign is complete. There are issues around what is "CLEC- affecting". Do CLECs get to vote on "CLEC-impacting" changes?	Core team	TBD	
219	Issue	Dec 11 Meeting	Implementation of Interim Process for Product/ Process	Implementation of interim processes. Qwest should come back to the Core Team at redesign meetings with questions/concerns about implementing what is agreed to in redesign. This will insure that the implementation meets both groups' expectations, resolve ambiguities and enable (and may drive) clarification of the redesigned process in the Master Redline [this should be a	Core team	TBD	Related to #222

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN

Revised—December 11, 2001

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
				standing agenda item].			
220	Action	Dec 11 Meeting	CMP Redesign Improvements	Review the CMP redesign improvements matrix from Judy Schultz, to insure that it addressed the WorldCom issue # 4.	WCom— Liz Balvin	Jan 22-24	
221	Action	Dec 11 Meeting	PID and PAP Changes Post- 271	Send Qwest proposal for PID and PAP changes post 271 approval (9 state filing).	Qwest— Andy Crain	Dec 21	
222	Action	Dec 11 Meeting	Implementation of Process for Product/ Process	Provide timeline to implement the interim product & process change process.	Judy Schultz	Dec 21	Email to redesign team. Related #222

CMP Re-design Discussion Running List

Revised 12-11-01

- **Outstanding Items for Master Redlined Framework Language**
 - **Prioritization Process** (action items)
 - Will a new OSS CR go through prioritization? (#149)
 - Is prioritization on a per OSS basis? (#150)
 - Qwest position on prioritizing Regulatory changes (#167, 181)
 - Qwest position on prioritizing Industry Guideline changes (#168)
 - Can a CLEC prioritize/rank OSS interface CR candidates, even if the CLEC is not using the interface? (COIL-WCom)
 - Review LOE process to see if additional changes need to be made; Criteria used to determine 'level of effort' (Action item # 146, 214)
 - Attach the latest ranking form, sample of candidate list, and tabulation form (#174)
 - **Revisit Types of Changes** (Regulatory and Industry Guidelines #169)
 - **Introduction and Scope**
 - Timelines under the CMP are 'defaults' (#153)
 - **OSS Interface CR Initiation Process**
 - Proprietary CR and Comments/Concerns (#88, 89)
 - Criteria for a Deny CR (#118)
 - Qwest-initiated OSS Interface CRs (#148)
 - CRs that impact both an OSS Interface and Process (#163)
 - Review Qwest proposed language on the content of the Regulatory and industry guideline CR (Action item # 211, 212)
 - Develop a process to debate whether a CR is a regulatory and industry guideline change (Action item # 213)
 - Review Walk-on CR language for CMP meeting (ATT Issues List #6)
 - Review and close on CLEC Comments in the Master Redline framework
 - **Changes to An Existing OSS Interface Elements**
 - "Draft" industry guideline changes (#94)
 - Define changes to an OSS interface that may not require a CLEC to make coding changes, but may affect CLEC process or operations. (#137)
 - Maximum of major releases per calendar year per OSS, other than IMA (#139)
 - What is included in Technical Specifications (#141)
 - CR Initiation Process takes place before Changes to An Existing (#142);
 - Discuss and clarify in the Master Redline that CRs precede any changes (change, introduction, and retirement of OSS Interface) within the scope of CMP (exceptions? production support?) (AT&T Issue List #14)
 - Is the EDI Implementation Guideline under the scope of CMP? (#143)
 - We need to talk about addenda to release software and documentation. How is it done? How is it communicated? How is it documented? Are CLECs ever consulted? (Action item #217; ATT Issues List #15)
 - Address non-coding changes that may affect CLEC operations or processes

- Review and close on CLEC Comments in the Master Redline framework
- **Outstanding Items for Master Redlined Framework Language (continued)**
 - **Introduction of A New OSS Interface**
 - Review and close on CLEC Comments in the Master Redline framework
 - Close on timeline Note language (#140)
 - **Retirement of Existing OSS Interfaces**
 - Review and close on CLEC Comments in the Master Redline framework
 - **Interface Testing (consider same language for Changes to an OSS interface)**
 - Review certification/re-certification language (#186)
 - Define process for addressing non-production support problems that occur during Interface Testing; and address the process when a production code problem is found in the test environment. (#208)
 - **Escalation Process**
 - Define an escalation process for technical production problems for both CLECs and Qwest (#189)
 - **Exception Process**
 - Review the Exception process: what constitutes an exception for Systems, Product & Process and overall (#93), and action item # 126 and 215 (ATT Issues List #7).
 - **Administration**
 - Re-visit the CMP Web Site (#13G)
 - Timeframe and method that Qwest provides a notice on a CR response and post on web site (#145, 156)
 - **Managing the CMP**
 - Roles of representatives (#107, 172)
 - **Terms (#106, 133, 162, 182)**
 - **Scheduled Maintenance for OSS Interface (#209)**
 - **Define a Voting Process (#173)**

- **Other Outstanding Items for Discussion**

- **Performance Reporting Changes**

- Status: Process to manage changes to performance reporting, calculations, etc. (#158, 170)

- **Product/Process**

- Determine the elements for CMP Product/Process (#100)
- Are new product offerings brought to CMP as a Change Request? (#116)
- Revisit Qwest-initiated Product/Process CR Process (#180)
- Define What Is CLEC-impacting/not CLEC-impacting (#110, 137, 179)
- Discuss the possibility/criteria for CLECs to deny a Qwest Product & Process CR; implication for implementation.
- Revisit Qwest initiated Product/Process change process. There is an issue around its use after redesign is complete. There are issues around what is "CLEC-affecting". Do CLECs get to vote on "CLEC-impacting" changes? (Action item #218)
- Quick process when things go wrong: (Action item #187; ATT Issues List #9)
 - a. Qwest makes an internal change in process that impacts CLECs and the change has not gone through the CR process. We need to discuss a process for addressing these things. There should be a way for a CLEC to identify the problem and get a quick response from Qwest that withdraws the process change and makes it go through the CR process before Qwest can implement.
 - b. CLEC observes a problem on the Qwest side when CLEC submits LSRs. For example, we submit a number of LSRs with a Saturday due date. For a large group of these orders, we get a FOC for the following Monday rather than the date requested (this is where the due date CLEC requested does fit the interval for the service ordered). On our side, we see this large group and believe there is a systems or process problem on the Qwest side and want to identify the problem to Qwest as a group for resolution. Currently, Qwest will only work them one at a time. This is inefficient and provides poor customer service to CLEC and ultimately the end user. Perhaps this could be handled in a "production support" process linked to CMP for product/process (parallels to the systems side).
- AT&T Issue List #11: SCR092601 proposed by Qwest [cannot find on the web] **[Terry B. did a CR – 5582295 on this same topic, but earlier]**
 Description: Allow a jeopardy notification after a FOC instead of a non-fatal error after a FOC.
 SRN092601: In Qwest's response to its own CR, Qwest proposes a change to existing PIDs for PO-8 and PO-9.

At the last redesign (10/30-11/1), Qwest stated clearly that it does not want change management of PIDs dealt with in CMP. However, with this CR, Qwest proposes a change to PIDs. Are PIDs in CMP or not? We need to discuss further.

Other issues associated with this CR:

- a. Qwest initiated its CR after AT&T initiated its similar CR. Qwest held a side call in late August to seek concurrence on its CR and could not speak to the AT&T CR at that time. It appears that Qwest's CR leap-frogged AT&T's. Why?

b. At the October CMP Product meeting, AT&T's CR was discussed and was basically turned down. The next day, at the CMP Systems meeting, Qwest presented its CR and there agreed to do what Qwest wanted, but needed to be pressed by CLECs to do what AT&T has sought in the first place.

Related issue:

On November 12, 2001, AT&T received from Qwest final CR responses. One AT&T CR had to do with disconnecting the customer (being ported to CLEC) from the Qwest switch after received a message from NPAC. Qwest denied the CR citing a PID. If Qwest is going to deny CRs due to PIDs, we need to deal with PIDs in CMP too.

- Provide timeline to implement the interim product/process change process (#222)
- **Review Process to Determine and Implement Redesign Improvements (#177, 178)**
 - AT&T Issue List # 13: Has there been a discussion yet of what happens at the end of redesign? Do we all review the Master Redline and provide comments and get to where we say it is done (is this a vote)? Is there a process to send the whole thing to the entire CMP body? Once it goes to the CMP body, will there be a walk through of the document with time for questions/comments? Is there a vote at the CMP body?
- Discuss when an issue is appropriate for CMP and when the CLEC's Qwest account team is to handle an issue (action item # 216)
- **CMP Redesign Guidelines**
 - Define level of participation (CMP Redesign Core Team Expectations, #151)
 - Revise the CMP Re-design "Procedures for Voting and Impasse Resolution Process" to allow provisions to invoke a vote at the current meeting, not wait until the next session
- **Review Issues and Action Items Log (#184)**
 - Can we archive CLOSED issues and action items?
- **PCAT and Tech Pub Documentation**
 - CLECs want the version number at the front of the document (#199)
 - Identify existing documentation version control tools (#200)
 - How will the history change log work with the holding tank documents (#201)
 - Review Historical Change Log document and determine implementation date (#202)
 - Provide a drop down list for the PCAT topical section (#203)
 - How will Qwest insure that the dot changes and holding tank changes get updated on the operational version? (#204)
- **Discuss Retail- Wholesale Parity (#104, 105)**

EXHIBIT 12

AT&T Comments

CMP Redesign Gap Review (References to page numbers in the Master Redline are to the draft dated 12/10/01):

1. There is a difference between the processes in the Master Redline (p. 13 – OSS CR process and p. 19 – CLEC product/process CR process). If one submits a CR 3 weeks ahead of a CMP meeting, Qwest will have a response for the systems CR by 1 week before that meeting (next meeting after CR submission). However, the response on the product/process CR is not until the second meeting after CR submission.
2. We should have a complete review of the CR processes (systems and product/process) going over timelines and deliverables to insure that all parties have the same expectations. A timeline similar to those created for changes to an OSS interface would be helpful.
3. Master Redline p. 49 (Managing CMP) refers to a CMP Steering Committee. Is there one? What does it do? Page 50 (Managing CMP) refers to a standing agenda item on the effectiveness of CMP. Does this happen?

Qwest's Original proposal (June 2001) states "ongoing review of the CICMP occur at each CICMP meeting to enable co-providers the opportunity to express concerns or suggest changes." Other than the references above, this does not appear to be addressed in the Master Redline.

The Scope section of the Master Redline should state clearly that the CMP process is used to change CMP itself. In addition, discussion about that process is needed. Is it done with a CR submission? Is it treated as a systems or product/process CR (assuming those processes are different)? Does the entire CMP negotiate changes or would a committee be appointed to negotiate and draft changes? How are changes approved? Need an understanding of how the process for changes to CMP will work.

4. Master Redline, p. 6, states that "CMP is managed by CLEC and Qwest . . . " At this point, AT&T does not feel that this is happening. It appears much more within Qwest's control with regard to what gets done. This is related to item 15 below.
5. In the Master Redline (pp. 30, 51, 52), there are references to the 12 month development view. This should be fleshed out more to indicate what is included, what is the process for CLECs to comment on the development plan. What is the process for CLECs to seek additional development items on the plan? Discuss what has been implemented with the 12 month view, if anything.

6. We need to address all comments in the body of the Master Redline. It would help going forward to date comments that are inserted in the Master Redline document. That would at least give a reference to the meeting where the topic was discussed.
7. Terms/definitions. CLECs and Qwest have not finished going through the terms drafted by Qwest.
8. In Qwest's initial proposal (June 2001) with respect to new and retired interfaces, it states that Qwest will schedule "introductory-informal meetings with co-providers in advance of introducing a new application-to-application interface". It also states that a "similar type of meeting will be held 8 weeks in advance of introducing a new Graphical User Interface (GUI)." The only thing in Master Redline is a statement on p. 21 (Introduction of a New Interface) that "discussions between CLECs and Qwest may be held prior to the announcement of the new interface." AT&T believes that these discussions would be beneficial and should be mandatory, not optional ("may").
9. Master Redline, p. 23 (also p. 36 with change to existing interface), Qwest Response to Comments (Intro of New OSS Interface -- App. to App.). This section states that Qwest will respond to all CLEC comments and identify changes made as a result of CLEC comments. However, for the GUI, p. 27 (and also p. 39), the language states that "Qwest will consider CLEC comments and may address them with the release of the Final Notification." Why the difference? We should have the same process.
10. Need to include language in the Master Redline under "Types of Change"(p. 8) for Production Support (since under the Production Support language a CLEC is directed to the CR process for Severity 3 and 4 troubles).
11. Should have a discussion of what a "rate validation" is, how Qwest goes about it and address CLEC concerns raised in CMP. These are changes Qwest makes to rate tables that impact CLECs and there is not enough discussion (and no negotiation) before Qwest unilaterally makes changes to rates.
12. What is the process when Qwest believes that a CR is outside the scope of CMP? At a minimum, there should be a requirement that Qwest provide a response that explains why it believes the request is outside the scope and that should be discussed at a CMP meeting. What if CLECs believe a Qwest CR is outside the scope of CMP? We should revisit the scope language in light of the rejection of Eschelon's CR that related to PIDs, but did not actually seek to change any PIDs.
13. All of the items on the existing Issues/Action Items Log and the Running Log.

14. What happens to a CR that is introduced by a CLEC, does not gain support from other CLECs, but is nonetheless needed by the requesting CLEC? The way the process is drafted, the CR will never get implemented. What are CLECs to do to get the requirement addressed?
15. Qwest has the ability to reject/deny CLEC CRs. CLECs do not have the ability to reject/deny Qwest CRs. We need to discuss and find a way to balance the process. As it stands, Qwest CRs go through to completion over CLEC objections, however, CLEC CRs do not go through over Qwest's objection. CLECs have to use the escalation or dispute resolution process either to advance their CRs (when Qwest rejects/denies) or oppose Qwest CRs (when Qwest ignores CLEC objections). Qwest is never put in this position. This applies to product/process and may apply to systems as well (the group should discuss).
16. Related to number 15 is language currently included in the Qwest Colorado SGAT. Section 2.3.1 reads as follows:

If either Party believes, in good faith, that a change in Tariffs, PCAT, methods and procedures, technical publications, policies, product notifications or other Qwest documentation relating to Qwest's or CLEC's rights or obligations under this abridges or expands its rights or obligations under this Agreement and that change has not gone through CMP, the Parties will resolve the matter under the Dispute Resolution process. Any amendment to this Agreement that may result from such Dispute Resolution process shall be deemed effective on the Effective Date of the change for rates, and to the extent practicable for other terms and conditions, unless otherwise ordered.

The highlighted language above implies that there is no right of recourse for a change that does go through CMP and the result is in a conflict with the agreement. That would not be appropriate. Everything we have heard from Qwest in the redesign is that if a change comes through CMP and is in conflict with a CLEC's interconnection agreement, the interconnection agreement is controlling. This kind of language in the SGAT guts the contract, particularly when CMP essentially allows Qwest to run through any change it wants to.

17. How are Qwest-proposed *new* products/processes handled, versus changes to existing products/processes? Will Qwest put these through CMP?
18. With OSS, there are timelines for CR implementation that relate to a scheduled release date. We need a discussion of the timeline associated with product/process changes. Should these be sized in a way that relates to the length of time to implement based on training of Qwest personnel and deployment within CLEC organizations? Other considerations?

19. Where do RNs (release notifications) fit in the process today? Are they still used? If so, what is the process that precedes distribution of RNs?
20. We should state in the body of the Master Redline all of the states to which the CMP applies. Presumably, it will be all 14 Qwest states unless we have differences from state to state as a result of dispute resolution.
21. Master Redline, p. 51, states that "Additional meetings may be held at the request of Qwest or any qualified CLEC (as defined in this document)? Do we intend to define "qualified CLEC" in this document. The term is not used anywhere else in the Master Redline.

Does the provision in the Master Redline, page 54 (Meeting Minutes), mean the Qwest will prepare minutes from the monthly meetings as well as any other meetings held by the CMP group? How about clarification calls? Is there any CMP-related meeting for which minutes would not be taken? We should clarify the language to make clear when minutes will be taken. If there are minutes, are they just posted on the web or are they distributed by e-mail to just the participants/the entire CMP distribution? Does it depend on the meeting?

22. Qwest CRs need sufficient detail to enable CLECs to fully understand the change Qwest proposes. This should include marked-up product documents that would be changed if the Qwest CR is implemented.
23. Issue/Action Item 156 deals with clarifying notifications to be used. This should include: (i) what is each type of notification used for, (ii) how is distribution determined for each, (iii) what is the timing for such notification, (iv) what triggers such notification and (v) who (or what group) is the contact within Qwest for such notifications?
24. Discuss whether the CR form should include a field for the originator to provide an example that justifies the change requested. Also discuss whether to include a field that states the anticipated impact of such a change on the originator?
25. There seems to be a gap with respect to implementation of the redesigned CMP. CLECs and Qwest do not have the same understanding of the degree and quality of implementation. There should be an ongoing agenda item that brings back processes that are being implemented from Redesign and evaluates them. We could start with the document entitled "Change Management Process (CMP) Improvements – 11/26/01" that Qwest distributed at one of the Redesign meetings (one column has implementation dates). With joint input, this document could be made more meaningful and reflect a common understanding of where we are in the process.

26. Does Qwest believe that the process a currently written would permit a CLEC to submit a CR that requests that a new interface be introduced?
27. Page 19 of the Master Redline (CLEC Product/Process Change Request Initiation Process) states as follows (p. 13 has essentially the same process):

CRs received three (3) weeks prior to the next scheduled CMP meeting will be presented at that CMP Meeting. CRs that are not submitted by the above specified cut-off date may be presented at that CMP meeting as a walk-on item with current status.

Page 51 of the Master Redline (Meetings) states:

CLEC's request for additional agenda items and associated materials should be submitted to Qwest at least five (5) business days by noon (MST) in advance of the meeting.

We should discuss and draft language to deal with CRs that are submitted after the 3 week deadline, but could be presented at the CMP meeting as an agenda item rather than a walk on item.

28. The table of contents for the Master Redline should be updated to reflect all of the provisions contained in the Master Redline (for example, numbering in the table of contents does not match numbering in the Master Redline, headings in the table of contents don't always track with sequence or title of headings in the Master Redline, separate references in the table of contents to timelines contained in the redline would be useful).
29. All product and process issues remain to be discussed.
30. Page 9 of the Master Redline (Industry Guideline Change). The language could be cleaned up to define the category in terms of "guidelines established by telecommunications industry standards organizations," rather than just saying the category "implements industry guidelines."
31. Change management of PIDs. From statements Qwest has made, AT&T was under the impression that Qwest had proposed an industry forum approach to PID change management in the multistate proceeding. Upon review, the only thing AT&T could find is in Section 16.1 of Qwest's Multistate PAP:

"Every six (6) months, beginning six months after the effective date of the first Section 271 approval by the FCC of one of the states that participated in the multi-state QPAP review proceeding, Qwest, CLECs and the Commissions of those state[s] shall participate in a common review of the performance measurements to determine whether measurements should be added, deleted, or modified;"

If this is Qwest's proposal, it does not address the concern raised by AT&T and other CLECs in CMP Redesign that PID change management needs to be done in an industry process and CMP is the most appropriate place to do it (after ROC) because of the connection all of the activities in CMP have to the PIDs (Qwest rejects CRs based on PIDs; Qwest wants to call CRs relating to PIDs regulatory changes). This remains a gap in the Redesign.

32. AT&T believes that business rules are part of CMP? We need to be clear this is the case in the Master Redline? What process is followed to change business rules? Section 12.2.1.9.6 of the SGAT states that business rules regarding rejection of LSRs or ASRs are subject to the provisions of 12.2.6 (CMP language).
33. SGAT Section 12.2.10.2 refers to "CLEC Systems Help Desk" for "assistance in areas involving connectivity, system availability and file outputs." Is this the same as the IT Wholesale Systems Help Desk referred to in the Master Redline? If so, the Master Redline should state that the IT Wholesale Systems Help Desk is also known as the CLEC Systems Help Desk (and any other name it might be known as). If not the same, we should discuss.
34. Interconnect Service Center Help Desk. This should be worked into the CMP document. SGAT Section 12.2.10.2 states the SPOC for "CLEC to gain assistance in areas involving order submission and manual processes." There seem to have been a number of issues where the process followed at the ISC help desk changes and CLECs are not made aware of those changes until there is a problem processing orders. It appears to relate to training ISC personnel receive and implement that causes a change in process with no notification to CLECs.
35. Master Redline, p. 76 (Escalation Process), states:

"Any other CLEC wishing to participate in the escalation must submit an e-mail notification to the escalation URL within one (1) business day of the mail out. The subject line of the e-mail must include the title of the escalated issue followed by "ESCALATION PARTICIPATION"

With a recent escalation, a Qwest mailout pointed CLECs wishing to join an escalation to a website (not a URL for e-mail). When AT&T attempted to use the website, we had problems. It was not clear from the available prompts how to join the escalation. It was not clear after taking action whether the attempt was successful. Is confirmation supposed to be generated by the website or is confirmation supposed to come by e-mail from someone at Qwest? If so, who (what function)?

While we were directed to a website to join the escalation, this does not

appear to be the process written into the Master Redline. This appears to be an implementation issue. If the website works and joining in this manner is effective, that may be an ok thing, but the Master Redline needs to reflect the process and we all need to come to agreement on what the process should be and it should be implemented as agreed upon.

36. Versioning (with dates) and version change history for the CMP document. Once Redesign is completed, it would be useful to date and assign version " numbers to the document and maintain an historical log of changes going forward.
37. Review the forms that are used in CMP, insure that they are addressed in the Master Redline and attach them to the Master Redline. We should make clear the forms used for OSS and product/process are subject to CMP (LSRs, CLEC Questionnaire, Product Questionnaire, LOAs, Collocation applications, BFR form).
38. Discuss, confirm and reflect in the Master Redline all documentation that is subject to CMP (EDI Implementation Guide, SATE documents, IMA User Guide, etc.).
39. A statement in the Master Redline of what activities are not within the scope and, where appropriate, a reference to where/how such things are handled (i.e., BFR, account team activities, service managers activities).
40. In prioritization, the ranking is done 1 through N, where N is the number of CRs/changes under consideration. Discuss whether, as part of ranking, the parties can also designate "No" for a particular CR/change where parties actually oppose implementation of a certain change.
41. With respect to notifications called for in the CMP, there is usually a set list of items to be included. This list is sometimes qualified with the words "where practicable" (p.21, I.1, Release Announcement). AT&T would like a general provision in a "notifications" section of the Master Redline that states that while the lists of information to be included in notifications may be finite, we would like Qwest to include any other information it believes would be useful to CLECs in fully understanding the notification.
42. Master Redline, Production Support Language, page 72. Severity 3 notification interval for no change in status is 48 hours. AT&T would like to discuss bringing this down to 24 hours.

Master Redline, page. 70, Severity 3. The example states "Equipment taking hard errors, no impact yet." AT&T would like a clarification on what a "hard error" is.

43. Master Redline, Escalation Process, p. 77. AT&T seeks clarification. When an escalation occurs through this process, is it taken to the highest level within Qwest before Qwest provides a "binding position" rejecting the CLEC request, or, is the binding position response from the first level of escalation? Depending on the discussion, we may need clarification in the Master Redline.
44. SGAT Section 12.2.6 remains open.
45. We continue to receive notices for scheduled system downtime on too short notice (i.e., on 1/10/02 at 5:30 p.m. received notice on DLIS being down 1/12/02 all day). We have discussed in Redesign having Qwest provide these notices further in advance. We would like to receive them at least 5 business days in advance.
46. In terms of structuring the Master Redline document, AT&T would like to see one section on process relating to systems, a separate section on the process relating to product/process and a third section to address those changes that affect both systems and product/process.
47. The Master Redline has a couple of references to closing a CR (p. 20 – "when CLECs determine that no further action is required for that CR"). AT&T's experience is that Qwest seeks concurrence from the initiator of the CR before closing. It is not clear what triggers the closing of a Qwest CR. We should discuss and address in the Master Redline.
48. The Master Redline makes reference to a CR "status" in several places ("status is deferred", p. 14; "refer to status of existing changes", p.64; "walk-on with current status", p. 13). In addition the CR Form, item 21, refers to status. However, nowhere in the Master Redline are the various status types identified and described (e.g., presented, clarification, deferred, submitted, CLEC Test, development, etc.). This needs to be done.
49. Master Redline, Page 25 (also p. 38), states "Production Support type changes within the thirty (30) calendar day test window can occur without advance notification but will be posed within 24 hours of the change." We should make clear we have a common understanding of what "Production Support type changes" are and describe it in the document. The Production Support section starting on page 66 doesn't really make this clear. Are production support type changes in this context, changes needed to make the release operate in accordance with the final technical specification?
50. Master Redline, page 31, refers to "versions" (of interfaces). Maybe this will be dealt with in the "terms" section, however, we aren't clear if this refers to major release, point releases or all releases.

51. Master Redline, p. 36, Qwest Response to Comments. We should add "and action items" to the first sentence after "CLEC issues, comments/concerns" to reflect the need to address action items identified in the walk-through referenced near the top of the page.
52. Master Redline, p. 40 states "Qwest's planned implementation date will be no later than twenty-one calendar days from the date of the final release notice." AT&T believes that the highlighted language should be "no less than" so that we are assured that the full 21 days will pass before the release is implemented.
53. In the Master Redline, page 8 (Types of Change), we dispensed with the "type" designation. We just need to insure that those references are changed wherever it occurs in the Master Redline.
54. Master Redline, p. 63 (Application-to-Application Interface Testing), there is a statement "Qwest will send an industry notification, including testing schedules . . ." How will this notification be sent? Is it a release notification (RN) or something else?
55. AT&T received a draft Technical Escalation Procedure from Qwest the week of 1/7/02. This procedure is referenced in the Production Support section of the Master Redline and was assigned to a subteam of the Redesign group. A couple of gaps here:
 - (1) the e-mail message stated that Qwest wanted to send a near final draft to all CLECs for the 1/16/02 meeting, after receiving CLEC comments. However, we have made very clear in Redesign that any subteam activity must come back to the Redesign team before going to the entire industry group. Please adhere to this process.
 - (2) AT&T expects that the technical escalation process, once agreed to, will be added to the Master Redline (in the body of Production Support or as an attachment).
56. IT Wholesale Systems Help Desk. AT&T has pointed out in Redesign Meetings that the prompts are not clear and some of our centers have had problems getting to the right help desk to address a problem. The prompts take you to different centers, but they are confusingly similar. Following are the prompts we hear when we dial 888-796-9102:

"Welcome, you have reached the Qwest Wholesale Systems Help Desk:

- for assistance submitting an LSR using IMA or EDI, or to check status of an existing LSR, please press 1

- for a listing of current system outage notification, please press 2
- for any other system support, please press 3"

AT&T would like discussion about (a) where each prompt takes a caller, (b) what are the responsibilities of the folks answering the phone at 1, 2 or 3, (c) is there linkage between the different groups answering the different prompts, (d) what screening activities do the groups answering the prompts undertake. The welcome message welcomes the caller to the "Qwest Wholesale Systems Help Desk", singular. Is there only one help desk or multiple desks?

57. Master Redline, p. 69 (Production Support), states that "When the problem is recognized as the same, one of the tickets becomes the primary ticket, and the other tickets are linked to the primary ticket." On page 71, Status Notification for IT Trouble Tickets, Event Notifications include a description of the problem and trouble ticket number(s). Will this notification identify the primary ticket and all related tickets so that CLECs who have reported troubles know their ticket is being worked and that the problem has been captured correctly?
58. AT&T believes that notifications received from Qwest often are not detailed enough to fully inform CLECs about the change taking place. If a change will impact CLECs processes, clearly notification alone is not adequate and a meaningful consensus process needs to be established to reach agreement on the change in the first instance. Notifications, then, need to be complete enough to fully inform CLECs of the changes being implemented. We need a discussion of different kinds of notices that would be sent and the appropriate minimum content of such notices.
59. Most of the CM issues identified in the SGAT workshops remain open and need to be closed. These are issues Qwest committed to resolve through the CMP Redesign.

EXHIBIT 13

INITIAL IDENTIFICATION OF RE-DESIGN GAPS

The following are gaps Covad feels will need to be resolved prior to completion of the re-design. Although this list may not be all-inclusive, it does identify significant areas of concern. Further, Covad concurs in the gaps identified by other participants in the redesign process.

- The “shirt sizing” relative to OSS CRs is still unclear. Not only is there a need to quantify the sizes, but also it is necessary to know the output capacity of the shirt factory.
- Additional clarification needs to be developed around the timing of steps involved with the entire process, including escalation.
- How does our account /service manager fit into the CMP process? Are they going to work with us to get resolution to issues that have become CRs? Will the CMP supplant the account/service manager?
- How are OSS, Process and Product CRs to be cross-referenced and worked together when they are related? How will Qwest categorize and address product/process CRs that impact systems or compel a change to Qwest systems?
- If a Qwest initiated CR adds or alters terms and conditions to an existing IA, how will implementation be delayed pending resolution. What dispute resolution process controls?
- How are proposed pricing changes to be implemented if they are related to CRs, as they can't be implemented directly as part of a CR?
- What constitutes a regulatory CR? Additional work is required on criteria for designation of regulatory CRs. How is agreement reached on classification? Can a CLEC challenge the regulatory designation and, if so, what are the associated processes and timelines? Can regulatory CRs be submitted by any party? If a CLEC submits a regulatory CR, what process will apply to that CR and is it the same process that will be applied to Qwest's regulatory CRs?
- More clarification is needed around “joint escalations.”
- How are decisions around CR scope to be made? A single party cannot block a CR based upon their position that it isn't within the “scope” of CMP.
- How are Qwest-initiated Product or Process CRs to be administered? They cannot be handled as RNs, which will be implemented regardless of CLEC input.
- How are CRs, which are either directly or indirectly related to PAP/PIDs, dealt with as part of CMP? What is the interrelationship between the CPAP's reference to CLEC-affecting changes and the definition of CLEC affecting that is in the process of being developed in CMP Redesign?
- How will the positive aspects of the collaborative effort used to develop the Collocation Cancellation and Decommissioning offering be incorporated into CMP?
- What process will be used to make changes to CMP once it has been “re-designed”? By what method does Qwest propose to prove that it has actually implemented changes as it represents it has done/is doing/will do?
- Is Qwest still committed to redesigning product and process or will it stop at systems?

Mike Zulevic
Director-Technical/Regulatory Support
Network Planning and Capacity Management
Covad Communications

EXHIBIT 14

GAP ANALYSIS: ISSUES TO BE ADDRESSED IN CMP RE-DESIGN¹

Eschelon Telecom, Inc.

January 9, 2002

SCOPE

PID/PAP: PID interpretation, measurement, and changes and Qwest use of PID information in CR Responses: Whether/how dealt with in CMP. (Refer to discussion in December CMP meetings.)

See also Types of Changes (Regulatory CRs) and CR Initiation below.

Rates:

Whether and to what extent/how included in CMP

"The extent to which rates are within the Scope of the CMP needs to be addressed and, if part of the Scope, language needs to be developed with respect to this issue. . . . Whether and how either Qwest or CLEC rates may be the subject of CRs has yet to be addressed." (Eschelon Comments/Nov. Status Report.)

Relationship to interconnection agreements

"Interim Scope of CMP: The Parties agreed that the Scope of CMP encompasses changes to products and processes (including manual) and OSS interfaces that affect system functions that support or affect the capabilities for local services provided by CLECs to their end users. Based on discussions since then and the Qwest-initiated CRs submitted (and not submitted) to date, however, the Parties have identified that further discussion is needed as to whether all issues within the Scope of CMP require use of CRs and, if not, the parameters for when CRs are required. The resolution of this issue may ultimately appear in the documentation in another section, such as the types of changes, but the relationship to Scope must be addressed." (Eschelon Comments/Nov. Status Report.)

Retail: "CLECs have indicated that they interpret the Scope language to include changes to Qwest retail systems or processes when those changes affect CLECs. For example, if a dramatic improvement was made to the raw loop data tool used by Qwest retail, ensuring that CLECs are aware of the change and a comparable change is provided to CLECs would be within the scope of CMP. If Qwest disagrees, additional discussion will be needed with respect to this issue." (Eschelon Comments/Nov. Status Report.)

Qwest Back-End Systems: CLECs have indicated that the definition of "OSS Interfaces" in footnote 1 to the Master Red-Lined Document is broad and includes changes to back-end systems and processes/functions/capabilities (as well as retail, *see supra*). The intent is a definition that is broader than may be associated with "OSS Interfaces" in other

¹ Eschelon has attempted to capture outstanding issues for Re-Design, but this list is not necessarily exhaustive. Also, new issues often arise in the course of discussions and that will likely continue to occur.

contexts. If Qwest disagrees, additional discussion will be needed with respect to this issue.

CMP encompasses/list: As indicated in brackets on page 6 of the Red-Lined Master, the Team agreed to revisit the list in this paragraph of changes that the CMP encompasses. ["requirement definition, design, development, notification, testing, implementation and disposition of changes – revisit list"]

CR v. Account Team: When an issue is within the Scope of CMP and should be handled by CR versus when an issue should be handled by the Qwest account team for that CLEC.

We have had instances where we take an issue to the account team. The account team tells us to go to CMP when we don't think it is a CMP matter. How are account teams informed of the distinctions between their functions and the functions of CMP? (AT&T 11/13 email)

INTERIM CMP PROCESSES

The interim processes for systems and product/process are not working to any party's satisfaction. Qwest has indicated a need for more guidance, and CLECs have indicated that Qwest is not interpreting the processes as anticipated.

For systems, for example:

--Qwest has made system changes (such as those involving rate and profile changes pursuant to a bill "validation" process) without submitting CRs and with inadequate notice as to the nature of the changes to CLECs affected by the changes. It did so, even though Qwest said in its December 4 Status Report, that Qwest would submit CRs, hold clarification calls, and discuss proposed changes at monthly meetings for proposed system changes.²

--Qwest included an entirely new system change (appointment scheduler) in a point release, which is not the purpose of point releases. Even when Qwest moved the change to a full release, Qwest did so without putting the change through prioritization and with insufficient documentation.

For product/process, for example:

--Qwest withdrew its Qwest-initiated Process CRs (except the one for Additional Testing) during the December Product/Process CMP meeting, even though Qwest said in its October 11, 2001, Status Report that "The parties have also agreed in principle to interim processes for . . . CRs to be submitted *by Qwest and CLECs relating to product and process issues*" (p. 2 emphasis added).³

² Qwest Dec. 4, 2001 Status Report, p. 4: "The parties have now reached agreement in principle on an OSS interface change request ("CR") initiation process, which provides that Qwest and CLECs both submit CRs to request changes to OSS interfaces. Both Qwest-initiated and CLEC-initiated OSS interface CRs follow the agreed process. The process provides that Qwest will hold a clarification meeting to ensure that the intent of the CR is clear. All OSS interface CRs will be discussed and modified, if necessary, at the monthly CMP meetings."

³ Since then, Qwest has reversed its position on this issue, despite this documented understanding that Qwest would submit Qwest-initiated CRs for product and process changes. Qwest now relies on a

--Qwest initiated a CR relating to Additional Testing that provided insufficient information about the proposed change, included an effective date that was too short to allow CLECs to respond and prepare for changes, was inconsistent with CLEC interconnection agreements, and suffered from other problems that are described in the Joint Escalation of Allegiance, Covad and Eschelon of CR#PC100101-5. It appears that Qwest views the Product/Process CMP as a means to "notice and go" with changes (with the CR simply being another form of notice), even when interconnection agreement provisions vary from the changes in the CR. If so, the Product/Process CMP harms rather than helps CLECs because it allows Qwest to unilaterally make changes that it otherwise could not.

Also, more flexibility is needed in making needed and timely changes to the interim processes. One of the purposes of using an interim process is to test the process to determine what adjustments may be needed and then to test them.

Qwest does not have a clearly defined and documented procedure for identifying when a change is CLEC-affecting for the interim processes.

The numerous questions and disputes that have arisen show that the interim processes and documentation need improvement. In terms of time and resources, there is a tension between expending them on an interim process versus a long-term process. But, the issues take time to resolve, and something needs to be in place in the meantime. The current interim processes need improvement, while recognizing that they will not work as well as hopefully the long-term processes (on which the Core Team will spend more time).

TYPES OF CHANGES AND CR INITIATION

Documented flow for all types of CRs: Review and revise Red-Lined Master language as needed to ensure that the CR Initiation Process and the flow of CRs through conclusion of the process is described as to all types of CRs (not just CLEC-initiated CRs).

misstatement of the CLEC Position. The CLEC position is that provisions of the interim process that allow certain processes to be *expedited* applied only to regulatory changes (made as a result of the 271 workshops). CLECs were amenable to allowing for such changes to be expedited in the interim, based on the assumption that such changes had already been reviewed in the 271 proceedings. CLECs and Qwest clearly agreed, however, that Qwest would submit CRs for other process changes. If the changes did not stem from the 271 proceedings, the Qwest-initiated CRs would follow the normal CR course (and not the more streamlined provisions of the interim process applying to regulatory/271 changes). Qwest is now claiming that the distinction for regulatory/271 changes means that Qwest submits no CRs for non-regulatory/271 changes. That is not what Qwest said in its October Status Report, and that is not the case. The CLECs have clearly and repeatedly stated their position at the Re-Design sessions, but Qwest does not incorporate CLEC input on this issue. (At the December Re-Design meeting, Judy Schultz said that she believed the CLECs had made inconsistent statements and that past meeting minutes would reflect that. Eschelon said that the CLEC statements have been consistent and that the meeting minutes, if they reflect a different position, are inaccurate. Given the numerous time commitments, including meetings and projects such as this outside of meetings, Eschelon does not have an opportunity to review the minutes.)

System v. Product/Process (or both): Address “system” v. “product/process” CRs (criteria for determining proper forum; what happens when unclear or new facts determine other category is more appropriate) and the process when one issue has both systems and product/process aspects.

Document the process when a CR is moved from one category to the other and how this is indicated in the documentation so that the history can be fully tracked and understood.

Examples of CRs handled in both Systems CMP and Process CMP:

Process CR# 5582295 & Systems CR # SCR092601-1

Process CR# 5579345 & Systems CR # SCR112101-2

Process CR # PC083001-1 & Systems CR # SCR101901-1

Process CR # PC100401-2 & Systems CR # SCR112101-1

“Donna Osborne-Miller of AT&T asked where a CLEC should send a request if they were not sure of whether it was a product or process change. Mark Routh of Qwest stated when in doubt, CLECs can send the change request to either him or Matt Rossi. Routh clarified that he and Rossi coordinate all CRs received from CLECs to ensure there are no overlaps. Judy Schultz of Qwest responded that most product/process changes result in a system change, but that there was not a desire to create multiple CRs for the same request. Terri Bahner of AT&T expressed concern about what would happen if a CLEC missed a product or system affected on the CR form. Judy Schultz of Qwest stated that any areas being addressed by the CR request would be identified during the clarification meeting. **[AT&T Comment: This should be added to the issues/action items log. We need to discuss how these overlaps should be handled, what the process is for Qwest to expeditiously reconcile internally where a CR falls and how to process such CRs. If a CR affects both product/process and systems, what is done to coordinate among all the right folks? At which CMP meeting are they discussed (systems or product/process)?, etc.]** (AT&T 11/23/01 email – comments on meeting minutes)

Regulatory CRs: Ensure that the Core Team members have a common understanding of existing language defining Regulatory CRs and review whether any changes to the definition are needed. For example, Qwest has asserted that improvements that it seeks to make to improve PID performance to avoid PAP penalties may be considered Regulatory CRs, and CLECs have disagreed. CLECs have pointed out that such a change may technically allow Qwest to meet a PID without actually improving quality of service to the CLECs. Also, if CLECs request quality of service improvements, but those improvements don't happen to be associated with a PAP penalty, the CLECs' requested changes have to go through prioritization. Qwest's requested changes should be subject to prioritization as well. If Qwest's requested changes are more important, they will be prioritized over the CLEC's requested changes. Define process for Product/Process CRs, as well as Systems CRs.

Industry Guideline CRs:

Do we need to add language such as “or other recognized and agreed upon industry guideline body” to ensure that the list of industry groups is complete (and flexible if Qwest and CLECs agree to add any)?

The Redlined Master language states: “using a national implementation timeline, if any.” Need to be sure document, in some section, deals with the process when there is no timeline, when the timeline is optional and Qwest and CLECs do not want to implement per that timeline, etc.

Develop and document process for handling “draft” industry guideline changes. (#94)

Need to discuss and document relationship to prioritization.

Qwest-Originated CRs: The current definition encompasses systems and product/process changes within the scope of CMP. Has Qwest’s position changed on this? If so, what is Qwest’s position and proposed language?

Processes need to be developed with respect to CRs submitted by Qwest for systems and product/process issues.

Whether and to what extent agreement or approval is needed, and the process for obtaining it when needed, are all issues that remain for discussion in the CMP Re-Design.

Status History: Need to be sure that Status History is updated, as with CLEC CRs. (Has not been done for Additional Testing CR.)

Whether Qwest-initiated CR can include an effective date (and, if so, may a CLEC-initiated CR include one, and are they treated the same):
“If Qwest can announce an effective date in a CR and unilaterally implement it over CLEC objection, submission of a CR is, in effect, no different from merely issuing a unilateral notification of a change. . . . The Core Team also needs to address whether the CR may become effective or the proposed effective date [if any can be in the CR] is suspended while the dispute is being resolved.”
(Eschelon Comments/Nov. Status Report.)

“The role of “clarification” discussions needs to be examined with respect to Qwest-initiated and other non-CLEC initiated CRs.” (Eschelon Comments/Nov. Status Report.)

CLEC-Originated CRs: Should the Master Reline include language, such as “originated by one or more CLECs”? May CLECs submit CRs jointly (and, if so, do the forms allow for this)? Once one CLEC has originated a CR, Qwest has indicated that it does not want to deal with multiple CRs on the same issue. Other CLECs thus monitor the progress of the first CLEC’s CR (and can later take up processing or escalation of the CR). Need to ensure documentation accurately reflects this process.

The Master, on pp. 14 & 20, provides that: "If the originating CLEC does not agree with the determination to escalate or pursue the dispute resolution, it may withdraw its participation from the CR and any other CLEC may become responsible for pursuing the CR upon providing written notice to the Qwest CMP Manager." Is withdrawal one of the current statuses? Is a notice sent to CLECs that a CR is being withdrawn so that others may assume responsibility?

Production Support CRs: This type of change was deleted. But, in the production support section, there are references to submitting CRs. Does this need to be addressed either there or in the types of changes section to clarify this? What type of CR is it? Is that sufficiently clear from the existing documentation?

"'Production Support' is not currently listed as a type of change, at Qwest's request. But, the production support language proposed by Qwest indicates that certain production support changes (at lower levels of severity) should be requested using a CR. Therefore, the parties still need to address this issue and the proper handling of production support changes." (Eschelon Comments/Nov. Status Report.)

Process for Determining Type of Change, if Disputed: "Need a process to debate whether a change fits as a regulatory or industry guideline change. With the information [below], CLECs will be informed to have this debate." (AT&T 11/13/01 email)

Tracking CRs: Redlined document indicates in brackets that this section will be moved to CR Initiation Process. Move it and be sure documentation reflects entire process for tracking CRs (and new format for status histories, interactive reports, etc.) and states that documents will be posted on the web and when.

Address when and how CRs are archived.

The CR Initiation Processes state that certain steps will be taken (such as producing meeting minutes) but do not necessarily state that these documents will be posted to the web and when. Is it sufficient to cover this in the separate section on documentation, or should it state that step here wherever applicable? (Does "issue" mean posting on web, or notice, or what?)

Acknowledgement/CR Number Assignment: The CR Initiation Processes state that the CMP Manager will assign a CR number before forwarding the CR to the CMP Group Manager and then the CMP Manager will send an acknowledgement to the CR originator. The processes (pp. 12 & 18) do not state, however, that the CR number will be provided to the originator until two days after acknowledgement. Currently, the CR number is included in the acknowledgment. CLECs need the number at that time to track the CR, to ask questions about its status, etc. The documentation should be revised to reflect the current practice of providing the CR number to the originator in the acknowledgement.

SMEs: State in the Master that SMEs and CRPMs will participate in the CMP meetings at which their CRs are discussed.

CR form:

Qwest has improved the CR form. Below are just a few comments on the form. Also, since the CR form changed, the format does not allow the originator to do spelling and grammar checks. If this could be fixed to allow such checks, it would be appreciated.

“WCOM COMMENT: WCOM WOULD LIKE IT NOTED THAT THE CMP REDESIGN TEAM HAS PROPOSED CHANGES TO THE CHANGE REQUEST FORM THAT WOULD CLARIFY THE CHANGE THAT IS BEING REQUESTED AND PROVIDE MORE GUIDANCE FOR QWEST TO ASSESS ABILITY TO SUPPORT AND LEVEL OF EFFORT. WCOM COMMENTS: WE NEED TO HAVE PARITY LANGUAGE FOR CHANGES MADE TO ALL INTERFACES AT THE SAME TIME INSERTED THROUGH OUT THIS DOCUMENT.)” (p. 12 of Master)

Accommodate requests by more than one CLEC/company (joint submission).

Examples/Documents: The CR form used to have a place for identifying relevant documentation; adding such a request back in to the form would allow parties to add specific references to relevant documentation (or attach it).

Confidentiality: The current CR form asks “Proprietary Submission for Account Manager Only?” CRs under consideration, however, should be known to others. Or, if not, the circumstances when a CR can be confidential/submitted only to the account manager should be set out in the documentation. If there is a proprietary component (such as end-user customer-specific information in an example), that can be attached in a separate, confidential attachment. Using confidential and non-confidential versions of the CR is another option if the initiator mentions such information in the CR description. The parameters for how this is handled should be outlined in the documentation.

Type of CR: The current CR form does not ask for the type of CR (regulatory, etc.). Should this be added to the form?

Also, WCOM has a comment in the Master Redline asking to add a reference to the types of CRs in the CR Initiation Process section (see Master, p. 12).

Organization of CR Initiation Documentation for Systems and Product/Process: The Master currently has one section for Initiation of CRs for Systems (starting on p. 12) and another for Product/Process (starting on page 18). Eschelon previously suggested that the initiation and clarification process should be described in one, single section, because it is the same for both. To the extent there are minor differences, they could be noted. Then, a separate section would describe the flow of the CR, once initiated, and that would have sub-sections describing systems and product/process, where they vary. Eschelon continues to request this structure, as it would be more clear and less complicated.

Systems CR Initiation Process: If the current structure is kept (separating systems CR initiation from product/process), the heading on p. 12 needs to be changed to insert "Systems" before "Change Request Initiation Process." It would also be helpful to add a cross reference to the Product/Process Initiation Process, so it is clear to the reader that one has to go elsewhere for those instructions.

"(WCOM COMMENT: THE WAY THIS READS, QWEST INITIATED CRS FOLLOW THIS SAME PROCESS, IS THAT THE INTENT? WCOM BELIEVES IT SHOULD BE.)" (Master, p. 12)

Some of the changes on p. 12 of the Master state "AT&T comment." Are the comments accepted?

Product/Process CR Initiation Process: As noted above, Eschelon believes that the initiation process should be combined in the documentation for systems and product/process so the reader knows that much of the process (such as the CR form, the assignment of a number, etc.) is the same. As it is, some of the information is repeated but not necessarily with identical language, and it is confusing as to whether and when there are substantive differences.

In any case, the Product/Process Initiation Process has to be expanded/revised to address Qwest-initiated CRs (including Regulatory and Industry Guideline CRs initiated by Qwest), as well as CLEC-initiated CRs. The word "CLEC" needs to be deleted from the title of the section on page 18, and each step has to be reviewed and revised to state the application to Qwest, as well as CLECs.

Time frame for CR submission: What process allows CRs to be submitted less than the agreed upon timeframe for CR presentation at the upcoming CMP meeting? Will the Exception Process accommodate this situation? (#126)

Clarification meetings/calls: The documentation should refer to a call or a meeting, rather than a meeting, as it generally is a call/conversation (but could occur during a CMP meeting).

Eschelon's understanding is that clarification calls are not to be used for delay, and that the conversations may occur during the CMP meeting. The Master, on p. 13, however provides that "Qwest may not provide a response to a CR until a clarification meeting has been held." This makes it sound as though a separate meeting must always take place. If the CR is clear, no clarification meeting may be needed (at least separate from the CMP meeting). The documentation should state the purpose of the clarification calls. These calls were added to the process to help ensure that the CR is understood, the correct SMEs participate in the discussions, and the answer is responsive to the need. They are not to be used for delay when the issue is clear. (If there are times when no clarification call is needed, this could be stated in the document.)

The quoted sentence in the previous paragraph assumes that the CLEC submitted the CR and Qwest needs clarification. The reverse may be true, and the language should be modified to address the opposite situation as well. Clarification needs to be defined (in this section, in the definitions, or both). We have talked about the difference between clarification and problem-solving/response, but that discussion needs to be captured in the documentation. The documentation needs to state that, if the discussion moves

beyond clarification to these other stages, other CLECs need to be invited, with adequate notice, etc.

CLEC comments and Qwest responses should be communicated to CLECs. Create a method to communicate via web site. (#145)

Application of CR Process to Qwest: Throughout the *CR Initiation* sections, the application to Qwest needs to be addressed in the language. (For example, the Master; on p. 13, states what will happen at the clarification meeting. It refers to "Qwest and the originator." What if Qwest is the originator? If Qwest is the originator, do CLECs ask their clarification questions about the CR during CMP meetings? What is the process? For example, Qwest's appointment scheduler CR raised a lot of questions, and the process did not adequately address getting answers promptly. How will this work in the future? The documentation needs to address this more clearly.

Information Needed in CR: "Add description of information that such CRs should contain (such as citations with page and paragraph number, etc.) **Qwest agreed to add language to the CR for regulatory changes to include the effective date and docket number.** [AT&T Comment: This will not be enough information. The CR originator should also provide order numbers and dates, page numbers and paragraph numbers supporting the CR. If the language of the order does not directly support the CR, the originator should provide its reasoning as to how the regulatory order mandates such a change. Mandatory dates for implementation required by the regulatory order should also be provided.]" (AT&T 11/23/01 email)

Review CR form – does it need revision to request such information and provide space for it? (Does CR form

Changes to the CR form information (based on errors or new information): "Terri Bahner of AT&T expressed concern about what would happen if a CLEC missed a product or system affected on the CR form. Judy Schultz of Qwest stated that any areas being addressed by the CR request would be identified during the clarification meeting." (AT&T 11/23/01 email – comments on meeting minutes)

Document this response/process in Red-Lined Master.

Posting of CRs submitted but not accepted by Qwest: Whether/when allowed; Visibility into Qwest decisions (such as scope); process (such as posting CRs on web).

New Interfaces & Retirement: "Larry Gindlesberger of Covad Communication mentioned that the CMP redesign team should look at the CR process to ensure it covers how CRs are managed for a New Interface [AT&T Comment: **add to the issues/action items log, if not there.**]" [AT&T 11/23/01 email]

Clarify in the Master Redline that CRs precede changes to an interface, introduction of a new interface (and retirement?), etc.

Retail: Process to ensure that retail changes that are CLEC impacting go through the CMP (*see also* Scope).

Who has responsibility for determining whether or not a change in retail is CLEC impacting and requires notification via the CMP process? (#104)

“Initiation” v. Remaining Flow of CR: The CMP documentation needs to more clearly distinguish between the steps necessary to “initiate” a CR and the steps that then follow, after initiation and through closure/denial. (See next section.) Simply separating out the steps and adding more accurate headings to the documentation would be a good start to clarifying the steps involved in processing and implementing a CR. Now, different issues are lumped together under the heading of “initiation” even though they deal with presentation, responses, etc. The documentation does not lead the reader to the desired information and could be much more clear.

Once the “statuses” of CRs are finalized, perhaps one section is needed for each status (presented, response, CLEC or Qwest test, etc.). This does not necessarily mean drafting new language; most of it may involve better organizing existing language and then reviewing it to ensure it is accurate/complete. Applicable section could define the status (or, do so in definitions) and state when it applies. For example, for CR initiation, would this be the “Submitted” status?

See next section.

PROCESSING OF CRs AFTER INITIATION TO CLOSURE/DENIAL

All types of CRs: Review and revise Red-Lined Master language to ensure that the flow of CRs through conclusion of the process is described as to all types of CRs (not just CLEC-initiated CRs). Other than possibly prioritization of certain regulatory and industry guideline changes associated with mandated deadlines, are there any other differences in the handling and process flow for any type of CR? If so, not clear from current documentation.

Flow: At a CMP meeting, Qwest presented a proposed flow/diagram of a CR through the process, with approximate “status” stages. The CR Initiation subcommittee, in its one call, discussed the diagram, and Qwest was going to revise it for further discussion. Review the revised diagram and consider whether it would be helpful to include in the Master, once the various stages and statuses are agreed upon.

Similar CRs: If Qwest and a CLEC (or two CLECs) submit substantially the same CR, what is the process for dealing with them?

“Qwest initiated its CR after AT&T initiated its similar CR. Qwest held a side call in late August to seek concurrence on its CR and could not speak to the AT&T CR at that time. It appears that Qwest’s CR leap-frogged AT&T’s. Why?” [AT&T 11/13 note]

“At the October CMP Product meeting, AT&T’s CR was discussed and was basically turned down. The next day, at the CMP Systems meeting, Qwest presented its CR and there agreed to do what Qwest wanted, but needed to be pressed by CLECs to do what AT&T has sought in the first place.” (AT&T 11/13 note)

Presentation of the CR: The description of presentation should clarify that clarification may occur at the same time, if there was not opportunity before-hand (and additional clarification may also occur afterward, if necessary). (Pp. 13 & 19 of Master refer to "previously held" clarification, though that isn't always the case.) Qwest and CLECs will be given an opportunity to comment and ask questions. (not just Qwest, see pp. 13 & 19). The documentation should state when the "presented" status applies/occurs.

Consensus for solutions: The Master states, on pp. 13 & 19, that "Consensus will be obtained from the participating CLECs as to the appropriate direction/solution for Qwest's SME to take in responding to the CR if applicable." Define consensus and the process for this. If there are several participating CLECs and they do not agree, is a vote taken? What if all of the CLECs agree but Qwest does not, is this a denial? Is this part of the presented status, development, or other?

Responses to CRs: The responses should not be dealt with in the CR "initiation" section. *See supra*. This is another step in the process, and the documentation will be more helpful if the steps are clearly laid out.

If there are criteria for formulating the responses, these should be described in the documentation.

The Master, pp. 13 & 19, states that the only responses are "accepted" and "denied." Does this cover the universe of responses? Is this consistent with the "statuses"?

Need to deal with CLEC responses to Qwest CRs as well as the reverse.

"(WCOM COMMENT: AGAIN THE WAY THIS READS, QWEST INITIATED CRS MAY BE DENIED AS WELL. THIS IS APPROPRIATE GIVEN THAT THE CMP REDESIGN TEAM AGREED THAT QWEST AND CLEC ORIGINATED CRS GO THROUGH THE SAME PROCESSES.)" (Master, p. 14)

The Master, on p. 14, states that Qwest's response, for systems CRs, will identify the preliminary level of effort. The Master, on p. 19, does not have a comparable section for product/process. Is there some estimate of the size of product/process changes and will this be included in such responses? Also, WCOM comments (Master, p. 14) as to systems: "(WCOM COMMENT: WCOM WOULD LIKE IT NOTED THAT A REQUEST WAS MADE AS TO WHAT IS MEANT BY PRELIMINARY LEVEL OF EFFORT AND IS TO BE DEFINED BY QWEST.)"

The Master states, on p. 13, that: "Qwest may not provide responses to these walk-on requests until the next months CMP meeting." Address whether Qwest may provide a written response, to all CLECs, at any time. With respect to problem solving or discussion of the response, shouldn't the documentation indicate that this may occur under certain circumstances, to avoid a long delay, as set out in the attached Eschelon email to Qwest (Jan. 7, 2002)? This is what the subcommittee discussed, and the Core Team should address it and revise the Master as needed.

--The Master, on p. 19, states that Qwest may provide a modified response at the next monthly meeting. Such references should be changed to "at or before" (and the word "written" inserted before "response"?).

--The Master, p. 51, states that any party may request an additional meeting on 5 days notice. If this is the case, and a CR initiator does not want to wait until the

next CMP notice for a response, the initiator may request a meeting in 5 days. Is that how this works?

Development: Define this stage of the CR process, when this status applies, etc. Is this the best descriptor for this status?

CLEC or Qwest Test: Define this stage of the CR process, when this status applies, etc. especially as it applies to product/process and is not yet in the Master.

The Master, p. 20, appears to limit the test period, at least for CLECs to 60 days. Some of the CLEC test phases to date have taken longer. (A particular issue may be difficult to identify or not arise that often due to billing cycles or other issues.) Is it the intent to limit CLEC and Qwest test to 60 days? Or should it say, unless otherwise agreed upon?

Implementation: The Master, on p. 20, states that Qwest will deploy the "Qwest recommended" implementation plan. In the preceding sentence, it states that the time frames will be defined in CMP. Is this a consensus process? How are time frames developed, and are similar time frames applied to CLECs and Qwest?

Closed, denied, deferred: Define these stages of the CR process and when they apply/occur. (e.g., #118)

"Schultz explained that a CR is not closed until the CLECs agree to close it at the CMP meeting. [AT&T Comment: **the process/timing for closing a CR should be discussed and documented in the Master Redline document.**]" (AT&T 11/23/01 email – comments on meeting minutes)

--The Master, on p. 20, states that the CR will be closed when CLECs determine that no further action is required. (This is for product/process CRs.) Could insert here "at a monthly CMP meeting." For systems, the Master, on p. 16, states that the CR will be presented for closure at the CMP meeting.

Overall Review of Statuses: Are there any others (such as after presented but before development)? Are the current descriptors the best ones? Do they convey accurately the status? Document who determines status description and how is this reflected in the CMP documentation.

Organization: Description of the development cycle for systems is currently lumped under the heading of "CR Initiation." (See Master, pp. 14-15.) A reader looking for this information would not know to look for it in this section. This is another reason why the organization needs to be clear, and the steps outlined in separate sections that are titled in a manner that the information can be located. See above.

"Rolling" CRs: When a CR is important to one company (CLEC or Qwest) but does not get prioritized or consensus, what are options available to CLEC or Qwest? Does this vary by type of CR?

Allegiance has raised this with an example of a CR that it has had open for some time but which has not yet been implemented.

Qwest has raised this with respect to PID/PAP CRs.

How does the BFR process apply, if at all? Does it apply equally to Qwest and CLECs?

Substantive discussions (beyond clarification) and Qwest responses to CRs: *See supra* (CR Initiation) and Attached 1/07/02 Eschelon email to Qwest.

The parties need to develop and document the process flow from initiation through closure for Regulatory and Industry Guideline types of changes for systems and product/process.

Time Interval: The aggregate time it will take for a systems CR to run through the process. [AT&T 11/13/01 email]

Time Interval: The aggregate time it will take for a product/process CR to run through the process.

Fair time interval for consideration and implementation of CRs: Ensure that the process is fair so that Qwest-initiated CRs do not routinely take less time to process than CLEC-initiated CRs. [This relates to the issues of whether some agreement/consensus is needed as to Qwest-initiated CRs and whether Qwest may include an effective date in a CR. If Qwest's CRs are basically handled on a notice basis (without requiring CLEC approval), they will routinely be processed in approx. 30 days or less, whereas CLEC-initiated CRs are rarely implemented in that amount of time.]

Denial: Criteria for denial of CRs.

ESCALATION AND DISPUTE RESOLUTION PROCESSES

Document ability to escalate Qwest decision not to accept a CR, if such decision is allowed (e.g., Qwest's determination that CR not within Scope of CMP).

--Master, p. 75, states that escalations may relate to the CMP itself; this includes scope, correct?

Develop an escalation process for technical issues addressed by Qwest's IT wholesale systems help desk.

Ensure Escalation and Dispute Resolution Processes are drafted for Qwest's use as well as CLEC use:

"Interim Escalation and dispute resolution processes for the CMP: Questions have arisen as to when and how the escalation and dispute resolution processes for the CMP apply to Qwest. For example, Qwest submitted a CR in which Qwest stated an effective date for the change "request" in the CR. Although CLECs have objected to the requested change and its effective date, Qwest is

nonetheless implementing the CR (including application of rates)." (Eschelon Comments/Nov. Status Report.)

E.g.: Section IV of the Master Red Line states that the decision to escalate is "left to the discretion of the CLEC," but Qwest may need to escalate in a situation in which CLECs do not agree to or accept a Qwest-initiated CR.

Also, on pp. 14 & 20 of the Master, it states that CLEC's may escalate if they do not accept Qwest's response. It needs to state that Qwest may escalate if Qwest does not accept CLECs' response. (On these pages, add a cross reference to the Escalation section of the document.)

Email/web script: The written process for escalation (Master, p. 75) anticipates an email, and the described information is inconsistent with the web script. Particularly unless and until the web script is more user friendly and flexible, CLECs need to be able to use email. The process for other CLECs to join (or assume responsibility) for an escalation also needs to be clarified (and the process described in the notices needs to be consistent with what is said in the Master).

Formal complaint process: "We received the attached Mailout concerning the updated process for initiating formal complaints. When I look at the web page for the Process for Initiating Formal Complaints it sends me to Expedites and Escalations. Nowhere on that page does it address Formal Complaints. Is there a formal complaint process? Where is it documented?" (1/4/02 Eschelon email to Qwest)

Time frame for mail out notification of escalation: "in a time frame to be determined – Jarby" (Master, p. 76)

With the recent escalations, there was confusion about how other CLECs joined the escalation. Some indications were to contact the CMP Manager and others to go to a web site that may not have then been clear. The Master, p. 76, refers to an email process. If that is the process, the notice should say so. Need to clarify.

Next steps/implementation: The document states that Qwest will respond and CLEC will reply. (This could be the reverse with CLEC responding and Qwest replying, if Qwest initiates the escalation, as should be provided for in the documentation.) After the reply, what is the next step? Is it discussed on a call, at the next monthly CMP meeting, etc.?

Can a CR be implemented if the escalation does not end in mutually agreeable resolution? For example, if CLECs reply that they do not accept a Qwest response, does Qwest have to go to the applicable regulatory body(ies) before implementing? (*See also* relationship to interconnection agreement.)

Resolution: The Master, p. 77, states: "When the escalation is closed, the resolution will be subject to the CMP." What does this mean? For example, if one CLEC and Qwest agree to resolve an escalation, do the other CLECs then need to address the resolution at the CMP? If CLECs do not agree with a Qwest position in an escalation, does Qwest then bring the non-resolution back to CMP for further action? Does "subject to the CMP" relate to the statuses?

EXCEPTION PROCESS

Exceptions: “We need a fuller discussion and documentation of this process. What makes an item qualify as an exception? Should an exception first need to be “accepted” as an exception from the CMP group? If so, by what process?” (AT&T 11/13/01 email)

Invoke/process: Master, p. 34 (& p. 37), states: “Qwest will provide draft technical specifications at least seventy-three (73) calendar days prior to implementing the release unless the exception process (see Section xx) has been invoked.” Does “invoke” mean the CMP Participants have agreed to an exception? What is the process for “invoking” an exception?

Prioritization: What is the process for an Exception item during prioritization? (#93)

CORRECTIVE ACTION

Quick process when things go wrong:

Qwest makes an internal change in process that impacts CLECs and the change has not gone through the CR process. We need to discuss a process for addressing these things. There should be a way for a CLEC to identify the problem and get a quick response from Qwest that withdraws the process change and makes it go through the CR process before Qwest can implement. [AT&T email 11/13/01]

Code of Conduct – what is the disciplinary action when guidelines – (includes compliance) are not adhered to (#105)

SYSTEMS CR DEVELOPMENT CYCLE

Packaging:

“(AT&T Comment) Packaging: Qwest and CLECs will discuss grouping candidates with affinities may be addressed more efficiently if taken together.[AT&T comment: this may not be exactly the right description. We just wanted to add this to this list of steps.]” (Master, p. 15) Has this comment been accepted? If so, develop language. Better definition is needed of “affinities” and when and how this happens and how much information is provided to CLECs to evaluate the “affinities” of some CRs as opposed to others.

“(WCOM COMMENT: PLEASE CLARIFY? IT SOUNDS LIKE QWEST CANNOT PACKAGE CRS UNTIL THE BUSINESS AND SYSTEM REQUIREMENTS PHASE IS COMPLETE WHICH IS AFTER PRIORITIZATION HAS TAKEN PLACE...THUS IT IS CONCEIVABLE THAT CRS THAT MAY HAVE BEEN CONSIDERED LOW PRIORITIZED COULD HAVE AFFINITY WITH A HIGH PRIORITY CANDIDATE AND BY ASSOCIATING THE TWO, A HIGHER PRIORITY CANDIDATE MAY NOT MAKE IT TO THE DESIGN PHASE BECAUSE OF THE PROCESS THAT WOULD BE IN PLACE WHICH LOOKS AT PRIORITY ORDER. QUESTION: IS IT POSSIBLE FOR QWEST TO PACKAGE CRS PRIOR

TO THE PRIORITIZATION PHASE? IF SO, WE COULD AVOID THE ABOVE POSSIBILITY.)” (Master, pp. 15-16)

Visibility to CLECs: The Master, p. 15) describes steps Qwest will take (such as design and code and test) but does not document that the information will be communicated to CLECs (when and how).

Release Candidate List: “(WCOM COMMENTS:CHANGE “INITIAL RELEASE CANDIDATE LIST TO “RELEASE CANDIDATE LIST.)” (Master, p. 15.) Comment accepted? If so, change?

Decision on Late Added CRs: The Master, on p. 15, states that actions will be taken “if the CMP body grants the request to consider late added CRs.” Is this a vote of CLECs and Qwest? Should the documentation be clearer about how this happens?

Decision on not including candidate in planned release: The Master, on p. 16, states what will happen when Qwest determines that it cannot complete a candidate in the planned release. Is this solely a Qwest determination? AT&T Comments change “advise” to “discuss” and suggest that either the candidate will be removed or that the release date will be delayed. If the latter, will this be voted on? Have AT&T’s comments been accepted? Need to clarify process.

PRIORITIZATION

See CR Initiation and Types of Changes (above) re. Regulatory CRs.

See Systems Development Cycle – Packaging (above).

See Introduction of New Interfaces (above).

Need to review all of the language in the Master regarding prioritization and the proposed prioritization form.

KPMG Observation 3067: Qwest Systems Change Management Process (CMP) lacks guidelines for prioritizing and implementing CLEC-initiated systems Change Requests (CRs).

When prioritization applies; whether prioritization is on a per-OSS basis.

The Master, on p. 14, states: “Qwest or CLEC originated CRs for changes to an existing OSS interface will then be prioritized by the CLECs and Qwest resulting in the initial release candidate list.” (Refer to broad definition of OSS Interface.) Is this always true, for all systems/interfaces/types of CRs?

Similarly, the Master, on p. 15, states “new CRs will be prioritized.” This statement is in the Systems CR Initiation Section, which applies to any systems

change (not simply GUI and EDI). Will all such CRs be prioritized? If not, description of process needs to be changed.

The Master, on p. 15, states: "If the requirements work effort, for the late added CRs, cannot be completed by the end of system requirements, the CR will not be eligible for the release and will be returned to the pool of CRs that are available for prioritization in the next OSS interface release." Will the CR always be returned, or does it depend on the priority of the CR? Is there a decision/vote on returning the CR to the pool?

Complete review of handling of regulatory and industry guideline CRs in prioritization. Qwest and CLECs have disagreed to date.

Action Item #142 states that "Qwest stated that Industry Guideline and Regulatory changes will not be prioritized, but a CR will be shared with CLECs at the Systems CMP Meeting" but fails to state the CLEC proposal.

Menezes stated that the CLECs would understand if there were a week difference in functionality availability between EDI and GUI, but that any greater amount of time would represent benefits to one interface user over another. Terry Wicks-Allegiance agreed with Menezes. The team determined to let this issue (EDI – GUI simultaneous functionality implementation) be addressed within the CMP process during prioritization discussion. **[AT&T Comment: It appears that this issue was captured as no. 157 on the issues/action items log. This item was closed as being resolved in the changes to Existing OSS Interfaces language. It may still be discussed in prioritization, if appropriate.]** [AT&T 11/23/01 email]

"WCom not allowed to vote on EDI CRs (Issue CM-12). This issue has not yet been addressed in the redesign meetings." Status Report.

During one of the last votes, Eschelon used three votes for its priority CRs but later found out that the CRs were collapsed into one change. Need a documented process to identify this earlier, when possible, so that a carrier may use votes wisely.

Voting by Qwest: Before Qwest-initiated CRs were included in prioritization, Qwest did not vote. Document that Qwest gets a vote if all CRs are included in prioritization.

Voter: The Master, p. 48, provides that the primary POC or the alternate may vote. May companies also designate someone to vote (as by proxy)?

Voting Process: There was discussion at a CMP meeting about the manner in which to vote (what numbers to assign, etc., and whether by email, etc.). (For example, on a scale of 1 to 10, 10 would be a higher priority.) Need to capture process in Master.

SIZING/LEVEL OF EFFORT

Sizing needs clarification/language. Need to define/quantify level of effort. (#146)

“Although the draft language refers to sizes of effort (small through extra large), no criteria are given for how these determinations are made.” (Eschelon Comments/Nov. Status Report.)

--See Master, p. 14: Do these definitions of small through extra large apply, and are they the only definitions? If the definitions are expanded or changed, do so on p. 14 as well as in level of effort section.

--Qwest had agreed that perhaps level of effort can be quantified in terms of hours (such as development hours), perhaps using ranges. Need to quantify and document.

Level of effort for product/process: Is there an equivalent concept of level of effort for product/process? What factors does Qwest consider (hours, expense, etc.?) and how and when are these conveyed to CLECs?

Define “preliminary” v. non-preliminary level of effort (see Master, p. 14) and when these occur. (*See also* CR After Initiation, above.)

“(WCOM COMMENT: WCOM WOULD LIKE IT NOTED THAT A REQUEST WAS MADE AS TO WHAT IS MEANT BY PRELIMINARY LEVEL OF EFFORT AND IS TO BE DEFINED BY QWEST.)” Master p. 14.

Need visibility into Qwest decisions and criteria used.

What make a level of effort “preliminary”? This appears to all be within Qwest’s discretion. How accurate can Qwest be at this point? Shouldn’t there be a readout on level of effort (in writing or at CMP meeting) to describe Qwest’s analysis on level of effort? [AT&T 11/13/01 email]

INTERNAL CRS (URS)

The UR process and how it feeds into the CMP. This should be documented in the Master Redline document]. [AT&T 11/23/01 email]

INTRODUCTION OF NEW INTERFACES

Consensus/prioritization: Should prioritization or consensus/approval apply to introduction of any new interfaces? (#149) If the development of the new interfaces will take away resources from development of other systems work of high priority to CMP participants, should the use of those resources be subject to discussion/prioritization?

For example, Qwest decided to introduce an appointment scheduler. If Qwest has consulted CMP in advance of that decision, and the CMP participants knew that additional development resources were available to work on a project, perhaps the CMP participants would have asked that the resources be used differently.

If a CLEC requests a new interface, is the process (and the criteria for deciding whether to approve the request) the same as if Qwest desires one (such as appointment scheduler)?

GUI/EDI: Are GUI and application-to-application interfaces for the same capability made available at the same time?

Introduction of a new GUI: "How and When Training will be administered (WCOM COMMENT: WHAT ABOUT IMPLEMENTATION DATE AND INTERFACE OVERVIEW SCHEDULE?)" (Master, p. 26)

Define Release Production Date in text or Definitions (AT&T Comment in Master, p. 26).

INTERFACE TECHNICAL SPECIFICATIONS

Process Flow: "Mitch Menezes of AT&T stated that CLECs needed to adhere to the timeline for providing comments even if the CLECs are not going to implement at the same time as Qwest. Jeff Thompson of Qwest stated that comments received after the comment cycle could be incorporated if necessary. Mitch Menezes of AT&T asked about adding a placeholder to ensure that the connection is made to between the CR Process and this Process. **[AT&T Comment: this should be reflected in the issues/action items log. The point is to insure that we are clear in the Master Redline about what the process flow is from beginning to end. Any process that is preceded by a CR needs to be clear. Any process that is not preceded by a CR needs to be clear.]** Menezes also asked if EDI Implementation guidelines are covered under the Change Management Process. Jeff Thompson took this as an action item." [AT&T 11/23/01 email – comments on meeting minutes]

--"Draft Interface Technical Specifications [make sure CR process and this process are linked properly in final document]" (Master, p. 33)

Red-lining to show changes: "Tom Dixon of WorldCom asked if a redlined version of technical documentation was provided to CLECs. Jeff Thompson answered that redlining the technical specifications will not be beneficial for the CLEC technical SMEs, therefore, Qwest will only provide a clean version of the technical specifications. **[AT&T Comment: Jeff did state that when the Final Notification Letter comes out, Qwest will identify in one of the documents provided what changed from the draft interface technical specifications.]**" [AT&T 11/23/01 email – comments on meeting minutes]

Clarify language re. 28th calendar day: "Draft GUI Release Notice was updated and new language added. "Prior to implementation of a change to an existing interface, Qwest will notify CLECs of the draft release notes and the planned implementation date. Notification will occur at least twenty-eight (28) calendar days prior to implementing the release unless an exception process has been invoked. This notification will include draft user guide information if necessary. CLECs must provide comments/questions on the documentation no later than 25 calendar days prior to implementation. Final notice for the release will be published at least twenty-one (21) calendar days prior to production

release date.” [AT&T Comment: we discussed that Qwest would provide the notification by the morning of the 28th calendar day so that CLECs have that first full day to review. This should be reflected in the language.]” [AT&T 11/23/01 email – comments on meeting minutes]

Release Notice Dates: “Generally, no less than one hundred (100) calendar days prior to the implementation of the new interface, Qwest will issue the Final Release Requirements to CLECs via web site posting and a CLEC notification. (WCOM COMMENT: WHY IS THE TERM “GENERALLY” INSERTED HERE? THERE SHOULD BE SPECIFIED RELEASE NOTICE DATES FOR INTERFACE TECHNICAL SPECIFICATIONS.)” (Master p. 24)

Timing of Comments: When are CLEC comments on draft interface release notices due? (WCOM comment on p. 39 of Master.) Add to document. Also, insert that Qwest response is due 4 calendar days “after receipt of CLEC comments.” (AT&T comment, p. 39 of Master)

CLEC Comments: The Master, p. 39, states: “CLEC comments to the draft notice may be incorporated into the final notice.” Are they ever required to be included? Are there guidelines for inclusion?

Define “technical specifications” in text or Definitions: AT&T & WCOM comments in Master, p. 35. (#141)

WALK-THROUGH

“Menezes asked if oral comments or questions during and after the walkthrough would be addressed in writing. Jeff Thompson of Qwest stated that if the question cannot be answered during the walkthrough, then a written response would be provided. Thompson took an action item to add a definition for Technical Specifications to the Terms section of this document.” [AT&T 11/23/01 email – comments on meeting minutes]

Draft: The Master, p. 23, states: “Qwest will sponsor a walk through, including the appropriate internal subject matter experts (SMEs), beginning one-hundred and ten (110) calendar days prior to implementation (AT&T Comment) *and ending one-hundred and six (106) calendar days prior to implementation.*” Has this AT&T comment been accepted?

CHANGE TO EXISTING OSS INTERFACES

Rolling 12 month view: Define. “At the first CMP systems monthly meeting of each quarter, Qwest will also provide a rolling twelve (12) month view of its OSS interface development schedule. (AT&T Comment) *(including proposed new releases, new interfaces and, to the extent possible, retirement of existing interfaces).* [AT&T Comment: *If there is another place where the rolling 12 month view is discussed, we*

could put this clarifier there, but this is the only place I have seen it so far.]” (Master, p. 30)

The Master, p. 51, states that: “The meeting may also include discussions of Qwest’s development view.” Is this the place to address this?

Billing Interfaces: “(WCOM COMMENT: BECAUSE QWEST DOES NOT SUPPORT VERSIONING FOR EBTA OR BILLING INTERFACES, THE REDESIGN TEAM NEEDS TO MAKE SURE THAT THE RELEASE NOTIFICATIONS FOR THESE INTERFACES ARE PROVIDED TIMELY ENOUGH THAT REQUIREMENTS CAN BE IMPLEMENTED BY CLECS PRIOR TO THE IMPLEMENTATION OF THE NEWEST RELEASE.)” (Master, p. 31)

GUI versions: “(WCOM COMMENT: WOULD IT NOT BE FAIR TO SAY THAT QWEST CANNOT SUPPORT VERSIONS OF ITS IMA GUI INTERFACE BECAUSE IT IS A INTERNET CONNECTION? THUS THERE IS A DIFFERENCE WHEN YOU CONSIDER THE ABILITY TO SUPPORT VERSIONS (EBTA & BILLING) AND THE INABILITY TO SUPPORT VERSIONS. WCOM BELIEVES THIS NEEDS TO BE MADE CLEAR.)” (Master, p. 33)

Relationship to CRs: “Prior to Qwest implementing a change to an existing interface, Qwest will notify CLECs of the draft Technical Specifications. (WCOM COMMENT: LANGUAGE SHOULD BE ADDED THAT INDICATES ANY CLEC AFFECTING CHANGE QWEST WILL HAVE FORMALLY SUBMITTED THROUGH THE CR PROCESS.)” (Master, p. 33)

Define Changes to the OSS interfaces that may not require a CLEC to make coding changes but may affect CLEC process or operations. Non-coding changes may not require a CLEC to make coding changes but may affect CLEC operations or processes. (#137)

MAJOR RELEASES

Scope/limit on number of major non-IMA OSS releases?

Are AT&T’s comments on p. 30 of the Master accepted? “Qwest will implement no more than four (4) releases per (AT&T Comment) IMA OSS Interface (AT&T Comment) [and no more than two (2) released for other OSS Interfaces.]”

“(WCOM COMMENT: IF THIS CLAUSE IS REQUIRED FOR IMA RELEASES ONLY, THERE SHOULD BE LANGUAGE TO ADDRESS THE RELEASE CYCLES OF OTHER OSSs INCLUDED IN THIS DOCUMENT.) [AT&T Comment: Qwest was to determine whether it can agree to 2 releases on interfaces other than the IMA.]” (Master, p. 30)

Define major release and release (#133)

Propose language for maximum number of major releases for OSS interfaces, other than IMA. (#139)

POINT RELEASES

KPMG Observation 3066: Qwest does not consistently employ the defined Change Management Process (CMP) to exclude CLEC-impacting system changes from point release versions of the Interconnect Mediated Access (IMA) interface.

Define the number of major and point releases that will be made in a calendar year.

The Master, p. 16, states: "If the candidate is removed from the list, Qwest will also advise the CLECs as to whether or not the candidate could become a candidate for the next point release, with appropriate disclosure as part of the current major release of the OSS interface." What criteria are used to determine whether it is a candidate for the next point release? Is this solely a Qwest determination? When does this happen?

TEST BED/MORE THAN ONE IP FOR TESTING PURPOSES

Has this issue been addressed:

CR# 4868276 on Att. D of the 8/16 CICMP Distribution Package (enhance testing environment by allowing for more than one IP for testing purposes and moving away from scheduling testing time periods for pre-ordering) is the CR that Qwest asked to cancel at the last CICMP meeting. (The Distribution Package is available on the web at <http://www.uswest.com/wholesale/cicmp/teammeetings.html>). We asked that this CR not be cancelled, and we continue to want the items requested. The CR will be discussed further at the next CICMP meeting.

We have asked for a test bed of accounts, but it wasn't clear at the last meeting whether the request for a test bed of accounts remains part of this CR. We continue to desire a test bed of accounts. (9/11/00 Eschelon email)

FAILURES IN PRODUCTION VERSIONS OF OSS INTERFACES

KPMG Observation 3052: Qwest's Change Management Process (CMP) does not have documented contingency plans and/or processes to correct failures in the production version(s) of OSS interfaces.

TEST ENVIRONMENT

See Issues Raised by AT&T in 12/3/01 email to Qwest (attached).

KPMG Observation 3068: Qwest's Interconnect Mediated Access (IMA) Electronic Data Interchange (EDI) Stand Alone Test Environment (SATE) does not offer CLECs sufficient troubleshooting capabilities.

KPMG Observation 3069: Qwest's Interconnect Mediated Access (IMA) Electronic Data Interchange (EDI) Stand Alone Test Environment (SATE) data request process does not provide specific, documented approval timelines.

KPMG Exception 3095: Qwest's Interconnect Mediated Access (IMA) Electronic Data Interchange (EDI) Stand Alone Test Environment (SATE) does not offer CLECs testing capabilities for all Qwest products offered in production.

KPMG Exception 3029: Qwest's Interconnect Mediated Access (IMA) Electronic Data Interchange (EDI) Interoperability Testing Environment does not offer Co-Providers with sufficient testing capabilities.

Testing in development cycle description: The Master, p. 16, states: "When Qwest has completed development of the OSS interface change, Qwest will release the OSS interface functionality into production for use by the CLECs." The only reference to testing in the preceding description of the development cycle is "code and test" work by Qwest. Is a reference to the testing environment (or cross-reference to the testing section) needed here for clarity?

Joint Testing Period: "Qwest will provide a thirty (30) day test window for any CLEC who desires to jointly test with Qwest prior to the Release Production Date. (WCOM COMMENT: WHEN SATE IS EMPLOYED BY A CLEC, JOINT TESTING IS NOT REQUIRED, THUS PLEASE ADD CLARIFYING LANGUAGE TO DISTINGUISH BETWEEN JOINT TESTING AND AVAILABILITY TO TEST PRIOR TO IMPLEMENTATION. WE NEED TO ALSO BE CONSISTENT WITH THE USE OF CLEC COMMENTS / CONCERNS.)" (Master, p. 38)

INDIVIDUAL INTERCONNECTION AGREEMENTS

Qwest needs to establish and document a process to account for individual interconnection agreements ("ICAs") when implementing changes and using the Change Management Process ("CMP"). Qwest needs to ensure that ICAs are not unilaterally modified.

In Colorado, Qwest said:

First of all, it has been addressed in these workshops by inserting language into the SGAT that indicated that the contract language controls over anything that could come out of the Change Management Process -- a contract is a contract, and I believe that's the same for any other ICA, as well.⁴

Qwest needs documented processes and checks and balances in place to ensure that Qwest can implement this concept and account for differences in ICAs (including ICAs not based on SGATs). The experience to date shows that Qwest's structure anticipates

⁴ Transcript of CMP Workshop Number 6, Colorado Public Utilities Commission Docket Number 97I-198T (Aug. 22, 2001), p. 292, lines 8-13 (Andrew Crain of Qwest).

making global changes and steps need to be developed to account for individual differences before implementation.

SGAT

How CMP is addressed in SGAT.

Qwest has made some changes to Section 12.2.6 at the request of CLECs, but the parties have not agreed upon the language in the entire paragraph.

ADMINISTRATION

Organization: The administration section is currently in the middle of the document. When finalizing the document, consider whether this should be moved up.

POC: The Master, pp. 48-49, provides for sharing and posting of CLEC contact information. Qwest contact information, including SMEs when assigned to CRs, needs to be shared, and the Qwest POC information posted. Qwest currently circulates a CMP meeting attendee list internally and to CLECs. That practice should be documented and the list should include CLEC and Qwest contact information.

Define responsibility for a primary and secondary POC and a CMP Team Representative. (#107)

Frequency of meetings: The Master, p. 51, says that meetings will occur at least once a month. Document a two-day session?

Distribution Package: Since this language was written, Qwest changed the format of the log, added more detailed status histories, and created the "interactive reports." Should the language on pp. 52 & 55 of the Master be revised to reflect the current practice and the terms used for the documents on the web?

The Master, on p. 53, states when Qwest will provide the package but not to whom. Does "electronically" mean email and web posting?

CMP RE-DESIGN WEB PAGE

Group documents by category – as number of documents increases, difficult to find.

With respect to the Re-Design website generally: "When the Re-design web site was new, it was ok to just list all the documents under 'Re-Design

Documentation.' Now that the volume has increased, however, it would be nice if these documents were grouped by category and information was up-to-date and easier to find." (12/17/01 Eschelon email to Qwest)

CMP WEB PAGE

Escalation (Process described in Master, p. 76, needs to recognize web script)

Documentation of process – should be able to find it under “escalation”

Responses and Replies need to be on web, promptly, and should be readable.

(The CLEC Reply to the Qwest’s Additional Testing Response shows up with a long header in the document. Is this a glitch?)

Web script needs revision to allow more flexibility. Allow for joint escalations.

Pull down menus need to give complete options, including “other, please describe.”

Need instructions for how another company joins an existing escalation.

Add a note/link in the CR status history so that it shows that the issue has been escalated.

Archived CRs: Where are they? (e.g., Eschelon CR #5043204: Was this archived/where is it?)

CRs (and their status histories) other than those initiated by CLECs (Qwest-initiated, regulatory, and industry CRs) need to be added to the Qwest wholesale CMP website.

NOTIFICATION

Processes for notification of CLECs and adequacy of process (Issue CM-17): “The current process, however, is still inadequate and needs further revision. The notices remain unclear as to the precise nature of changes and the basis for those changes, and further discussion is needed as to when a notice, as opposed to a CR, is sufficient.”

(Eschelon Comments/Nov. Status Report.)

--The Master document mentions types of Notifications in places, but little is actually said about them, when they apply, and their required content. A section on notifications is needed in the Master. If Qwest plans to use notifications, as opposed to CRs, in any situations (in the long-term, after the interim process), those situations need to be described in the Master.

Event Notifications: Need conventions/guidelines for content and timing of event notices. See Eschelon 12/0801 email to Qwest.

Call Center Outages: Review Qwest Center Outage Notification Process-Posted 10-29-01 (Action Item #40)

Network Outages: paging process for Network Outages (#42)

PRODUCTION SUPPORT

See Types of Changes and CR Initiation above.

Determine and document how to notify the CLECs that a trouble ticket has been escalated.

TRAINING

Review all proposed language for training. Identify when training will be posted on the web and where.

Is training required in some circumstances? If so, document when.

Will CLEC Forums be addressed here?

DEFINITIONS

Controlled Production Testing

Good faith

Release Production Date

Statuses (e.g., Submitted, presented, development, test, closed, denied, denied/deferred, escalated, etc.)

Timelines: evaluate if the timelines should be in business days or calendar days (#140)

Define in the Master Redline what it means to “walk an item on” at a CMP meeting.

“Does this replace clarification? Are there criteria for a walk-on (any kind of advance notice needed? Any demonstrated urgency required? does it in effect create an exception for the CR that is walked on?)? How is the timeline different for a walked-on item versus those submitted 3 weeks ahead of the meeting? Should this simply be treated as an exception?” (AT&T 11/13/01 email)

See also, Master, p. 51: It says that attendees should bring material relating to the walk on to the meeting. If the issue is known to the attendee in advance, should the attendee be required to provide the materials earlier? For example, Qwest introduced proposed changes to LNP only cutover intervals as a walk on at the end of the day in a CMP meeting and wanted a decision from CLECs on the issue. The agenda did not notify CLECs of the issue so they could have appropriate people in attendance. (Ultimately, a separate call had to be scheduled to discuss.) If Qwest has such a request, it should be properly noticed and materials included in the package.

Define terms used in Paragraph 2 in the body of the document (scope and introduction) and in the glossary of terms table on page 41 of the Master Red lined document. What is OBF’s definition? (#106)

Whether “CLEC operating procedures” is defined under Terms table in master redline document (#110) depends on whether this standard is used for the long-term process. That has not yet been addressed.

Review key terms used to ensure each is defined; review all language in “Definition of Terms” section.

PROPRIETARY CRs

Proprietary CRs: Define; whether/how/when to use – documented process

Proprietary CLEC questions and comments – documented process

Confidential and non-confidential versions of CRs: If a CLEC has examples that contain confidential information, for example, the CLEC may provide confidential and non-confidential versions of the CR or the attachments.

See above - CR form (The current CR form asks “Proprietary Submission for Account Manager Only?”). Need documented guidelines for when this applies.

The Master, p. 23 & 36, states: “The answers [to questions about the specifications] will be shared with all CLECs, unless the CLECs question(s) are marked proprietary.” Can any question be proprietary, even if other CLECs need the answer?

DOCUMENTATION

For Re-Design, it would be helpful if the action items in the log were grouped by subject matter (such as the headings in the Table of Contents), so that it would show outstanding issues by subject. This would be useful for comparing the log to the various gap analyses and determining which issues are not yet captured in the log.

KPMG Exception 3093: Qwest lacks uniform standards and processes for document management. Qwest has provided, to CLECs, documents in which one or more fundamental items of reference, such as the author, business unit, release date, page numbers, version control, assumptions, and change logs, is absent.

Develop and Document Versioning and Develop Version Change History Log

KPMG Exception 3102 (moved from Observation 3044): Qwest’s internal OSS interface change management documentation is inconsistent and unclear.

Changes to technical publications & product catalog – need long-term process in Master Redlining of changes noted in notices. (This may be different from the versioning issue.) The business need is to ensure that CLECs can identify the changes, at the time of the announcement, so that they can determine how the changes may affect them. The content of notices, and the requirement to redline changes, need to be documented.

In the interim, some changes have been communicated through notices, instead of CRs, because for example the changes were already reviewed in 271 proceedings. In the long-term, are there any changes for which CRs are not needed (such as typos) and how are those defined and handled?

Is the EDI Implementation Guideline under the scope of CMP? (#143)

Addenda to release software and documentation

“[AT&T Comment: We discussed that after the final specifications, there may be other changes made to documentation or the coding that is documented in the form of addenda. Is there another place in the Master redline where this will be addressed since it probably relates to new releases as well as new interfaces?]

(Master, p. 37)

PRODUCT/PROCESS CMP

Each section needs to be reviewed to determine whether it has aspects of product/process and, if so, how the language should be modified to address those issues. (#100)

Are new product offerings brought to CMP as a Change Request? (#116)

FINALIZATION OF CMP PROCESSES AND DOCUMENTATION

Interim to final: Current language and implemented processes are interim. After all components are developed, need to review for consistency, gaps, etc.

“Section X” references: At the end, need to insert references to the correct sections for these cross references. If the “Section X” does not actually address the issue as anticipated, need to either revisit that Section or the one that referred to it.

“URL to be established”: Either insert URL or, if the URL is likely to change, handle in a manner that does not require the document to change every time. (For example, “a URL identified on the CMP website under category X”?)

Global terms: Once terms are agreed upon, need to ensure consistency in documents (such as CLEC and not Co-Provider, etc.). For example, p. 50 of Master uses “provider” for Qwest still. Is this correct?

Inserted comments: find all inserted/bracketed comments (such as by AT&T and WCOM) in Master; ensure addressed and then delete reference to comment for final version.

Full CMP review: The Core Team has agreed that it needs to develop a process for bringing the results of the Core Team redesign effort to the full CMP and allowing other CLECs to have input at that point.

EXHIBIT 15

HIGH-LEVEL OVERVIEW OF GAPS:

Master Red-Line Document that needs to be discussed:

- Tracking Change Requests
- Is Web Site inclusive of ALL CRs (open and archived)
- Managing CMP Process: Governing Body
- Managing the Change Management Process: Purpose of Change Management POC (OBF)
- Production defects covered in Scope of CMP.
- Prioritization Process, Prioritization Review, Voting
- Language to address ties in prioritizing that results in CR making release or not.
- Production Support: Training
- History Log for technical publications implemented?
- Testing allowed for all products for change to existing OSS?
- Product & Process CR reasons for denial, ie, business rules, cost,
- Product & Process Qwest-initiated CRs that are CLEC-impacting
- CRs that affect both OSS and P&P
- How to handle Proprietary CRs (COIL)
- Level Of Effort that can straddle more than one release
- Product & Process Escalations (SGAT G)
- Maintaining CR and RN Tracking Databases (SGAT H)
- PIDs included as regulatory change/prioritization? (COIL)
- Versioning to existing interfaces (OBF 2233a2v21)
- Training
- Dispute Resolution Process
- Escalation Process
- Discussion on implementing the interim process otherwise it is just words on paper
- Finalizing the Master document to ensure completeness and end-to-end processes are all-in
- Compare Master Redline with Qwest Wholesale Program CMP Document dated 3/13/01.

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nclusive.

CMP REDESIGN GAP OVERVIEW

INTERIM MASTER RED-LINE TOC	TOPICS NEED TO BE DISCUSSED/DECIDED/CLARIFIED
1.0 INTRODUCTION and SCOPE 1. Introduction 2. Scope	1) Scope fully defined when 100% of the processes have been negotiated to determine completeness 2) Is production defects included in scope of CMP?
2.0 TYPES OF CHANGE I. Regulatory Change II. Industry Guideline Change III. Qwest Originated Change IV. CLEC Originated Change ** Production Changes	1) Regulatory CRs a) PID updates whereby system enhancements are identified (Coil) b) Disagreement (Impasse?) on PID/PAP changes for exception to the CMP prioritization process 2) Industry Guideline Changes: a) Governing bodies b) Timeline for implementation 3) Qwest Originated Change a) Source of changes (i.e. how are retail changes determined to be or not to be CLEC impacting) b) Document process for identifying CLEC-impacting changes c) Document what steps of the CR initiation process are performed internally by Qwest b) Conclude discussion on CLEC-impacting changes. 4) CLEC Originated Changes a) Evaluate Interim process to determine if working as expected b) Verify ability to initiate all types of changes 5) Production Changes a) Production changes that do not meet section 12 criteria
CLEC-QWEST OSS INTERFACE CHANGE REQUEST INITIATION PROCESS 1) CR INITIATION PROCESS a) Complete CR form b) Completed CR c) Clarification Meeting d) CR presented at CMP Meeting e) Qwest reviews CRs received f) accepted	CR Initiation Process 1) Needs parity language for changes made to all interfaces at same time 2) Re-address language where to send CR (ie. CMP Mgr vs. mailbox) 3) Language for inclusion of "type" of changes should be included (ie. Regulatory, Industry, etc.) 4) Language to address Qwest to follow same CR process (ie. denied, prioritized) 5) Process for CRs that cross-over both OSS and product and process. 6) How are proprietary CRs handled? 7) How are CRs tracked? CR presented at CMP Meeting 1) Process needed for CRs submitted less than agreed upon timeframe for presentation at meeting. Will Exception Process accommodate this situation? 2) Process for Qwest response and incorporation of CLEC comments

CMP REDESIGN GAP OVERVIEW

INTERIM MASTER RED-LINE TOC	TOPICS NEED TO BE DISCUSSED/DECIDED/CLARIFIED
<ul style="list-style-type: none"> 1) Option of how CR implemented 2) Preliminary Level of Effort ii) denied f) Prioritization of existing OSS CRs g) Qwest will begin development cycle i) Business & Systems requirements ii) Package iii) Design iv) Code & Test 	<ul style="list-style-type: none"> 3) How are Walk-on CRs handled? Preliminary Level of Effort <ul style="list-style-type: none"> 1) How is preliminary level of effort defined? More definition is needed. 2) Criteria for LOE. 3) Process to handle LOE that straddles more than one release 4) Qwest agreed to provide preliminary LOE before prioritization. Need language. Denied CR <ul style="list-style-type: none"> 1) Define denial process for Qwest's CRs. 2) Criteria for denial of CR needs to be stated (ie, business rules, cost, policy) Prioritization of Existing OSS CRs <ul style="list-style-type: none"> 1) Industry Guideline CRs be prioritized? 2) Performance measure obligations prioritized? 3) Voting process needs to be developed. 4) Need language if dispute/escalation process can be invoked in prioritization process? 5) CLECs want grouping (pkg)of candidates before prioritizing. 6) Is prioritization on a per OSS basis? 7) Need language to address requests for re-prioritization (re-rating) as the OBF language. 8) Need language to address any ties in voting that result in CR making release or not. Development Cycle <ul style="list-style-type: none"> 1) Package - need to address process if re-ranking is needed after package discussion. 2) Package - need to address that Qwest needs to address the different options for packaging and let CLECs have an input as to which option they desire -- maybe re-ranking is needed.
INTRODUCTION OF NEW INTERFACE <ul style="list-style-type: none"> 1) Application-to-Application OSS Interface <ul style="list-style-type: none"> a) Release Announcement b) CLEC comments/Qwest Response and Preliminary Implementation Plan Review Meeting c) Initial Interface Technical Specifications d) Walk thru of Draft Interface Tech. Specs. e) CLEC Comments on Draft Tech Specs f) Qwest response to comments g) Final Interface Technical Specifications 2) Introduction of a New GUI <ul style="list-style-type: none"> a) Release Notification 	Initial Interface Technical Specifications <ul style="list-style-type: none"> 1) Need language for Technical Specifications definition 2) CR Process and Tech. Spec. need to be linked in red-lined document 3) Timelines language regarding business days vs. calendar days 4) Language to address holidays in timelines 5) Address if CR is needed for new interface.

CMP REDESIGN GAP OVERVIEW

INTERIM MASTER RED-LINE TOC

- b) Draft User Guide
- c) Interface Overview
- d) CLEC Comments/Qwest Response
- e) Final Notification

TOPICS NEED TO BE DISCUSSED/DECIDED/CLARIFIED

CHANGE TO EXISTING OSS INTERFACE

- 1) Application-to-Application OSS Interface
- 2) Graphical User Interface (GUI)
- 3) Requirements Review App-to-App Draft Interface Technical Specifications

Change to Existing OSS Interface

- 1) Rolling 12 month view language needs to be included for all interfaces.
- 2) Language on number of OSS release cycles per year.
- 3) How are addenda to release software and documentation handled?
- 4) Address version to existing interfaces (OBF)
- 5) Address distinction between joint testing and availability to test prior to implementation
- 6) Address if process is needed for non-coding changes that may affect CLEC operations/processes
- 7) Address testing capabilities for all Qwest products offered in production.
- 8) **App-to-App joint testing** - address special procedures for geographical or system differences
- 9) Joint testing - address process if CLEC wants the test environment to support a new product.
- 10) Address language for production support and trouble tickets

4) Requirements Review GUI

- Draft GUI Release Notice
- Notice
- CLEC Comments on Draft Interface Release Notice
- Qwest Response to Comments notice

RETIREMENT OF EXISTING OSS INTERFACES

1) Application-to-Application OSS Interface

- Initial Retirement Plans
- Initial Retirement Notice to CLECs
- CLEC Comments to Initial Retirement Notice
- Comparable Functionality
- Final Retirement Notice

CMP REDESIGN GAP OVERVIEW

INTERIM MASTER RED-LINE TOC	TOPICS NEED TO BE DISCUSSED/DECIDED/CLARIFIED
2) Initial Retirement Plans (GUI) Initial Retirement Plans Initial Retirement Notice to CLECs CLEC comments to Initial Retirement Notice Comparable Functionality Final Retirement Notice	
CLEC-QWEST PRODUCT & PROCESS CHANGE REQUEST INITIATION PROCESS 1) CR INITIATION PROCESS a) Complete CR form b) Completed CR c) Clarification Meeting d) CR presented at CMP Meeting	1) Need language for denial of CRs (Qwest policy, business cost, specific regulatory ruling) 2) What about Qwest-initiated CRs that have CLEC-impacting changes? 3) CR language that affects both OSS and Product and process needs to be addressed. 4) Address Product & Process escalation process. 5) Verify Interim process is working as established.
MANAGING THE CHANGE MANAGEMENT PROCESS 1) Change Management POC 2) Change Management POC List 3) Preferred Method of Communication 4) Governing Body	1) Responsibilities/Roles and level of participation for CMP redesign 2) Ensure all items addressed are included in minutes and on CRs. 3) How will changes to PID/PAP's after 271 approval be handled?
MEETINGS Meeting Distribution Packages Meetings Minutes Qwest Wholesale CMP Web Site	1) How are monthly system outage reports generated and supplied to CLECs? 2) Is CMP website inclusive of all CRs? 3) Archive section for CRs on website states "coming soon" -- where were the previously displayed CRs before Qwest switched to the new interactive website.
PRIORITIZATION Prioritization Review Prioritization Process Voting	1) Need end-to-end development life cycle. 2) Language for mandatory/industry dates, allow for exception, escalation and dispute resolution procedures. 3) Prioritize all CRs. (regulatory) 4) Criteria how to rank CRs.

CMP REDESIGN GAP OVERVIEW

INTERIM MASTER RED-LINE TOC		TOPICS NEED TO BE DISCUSSED/DECIDED/CLARIFIED
PRODUCTION SUPPORT Newly deployed OSS release - Request for production support Change Reporting Trouble to IT Severity Levels Status Notification for IT Trouble Tickets Notification Intervals		1) Need escalation process for tech. Production problems. 2) Process for escalation of IT Trouble Ticket?
TRAINING		1) Incorporation to CMP 2) Document formal process (i.e. how can CLECs request specific training?)
ESCALATION PROCESS Guidelines Cycle		
DISPUTE RESOLUTION PROCESS Process		1) Need CMP Dispute Resolution e-mail address.
EXCEPTION PROCESS Define		Terms to be included: Release Production Date Migration Testing New Release Testing Regression Testing Controlled Production Testing Interoperability Testing Safe
APPENDIX A Definition of Terms		

EXHIBIT 16

EXCEPTION 3093 – FIRST RESPONSE

Qwest OSS Evaluation

Initial Release Date: December 12, 2001

First Supplemental Response Date: January 4, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Change Management Test, MTP Test 23.

Exception:

Qwest lacks uniform standards and processes for document management. Qwest has provided, to CLECs, documents in which one or more fundamental items of reference, such as the author, business unit, release date, page numbers, version control, assumptions, and change logs, is absent.

Background:

Qwest uses text documents, spreadsheets, presentations, and Web sites to disseminate information about existing and planned wholesale products and services, such as business processes, technical specifications, release schedules, notification intervals, training opportunities, and meeting events. Such CLEC-impacting information is time sensitive and critical to CLECs for establishing, maintaining, and improving business operations.

The *Qwest Change Management Process (CMP)*¹ states as one of its key elements “Consistent documentation and tracking of changes and change notifications.”² In addition, the document states, “CMP will improve and facilitate communication between CLECs and Qwest by supporting [...] consistent documentation and tracking of Change Requests (CR) and Release Notification (RN).”³ Furthermore, the *CMP* defines the sub-process, “Manage Documentation,” as follows: “Activities involve the creation and improvement of documents including logs, forms, and process descriptions.”⁴

Issues:

Qwest lacks uniform standards and processes for document management. KPMG Consulting found that the *Change Management Process (CMP)* does not include established processes to ensure that documents distributed to CLECs have uniform standards, and that a process for maintaining and updating documentation is in place. As part of the CMP Verification and Validation Review (Test 23), KPMG Consulting reviewed Qwest documents for the existence of documentation management standards, and found that a number of the documents lack fundamental items of reference, such as

¹ *Change Management Process (CMP)* document, dated May 11, 2001, is available at http://www.qwest.com/wholesale/downloads/2001/010514/CMP_Document_051401.doc

² Executive Summary section of the *CMP* document, page XX.

³ Section 3, Page 3 of the *CMP* document.

⁴ Section 3.2, Page 5 of the *CMP* document

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Qwest OSS Evaluation

the author, business unit, release date, page numbers, version control, assumptions, and change logs (see Appendix A for details).

Impact:

The lack of documentation management standards and processes may create difficulties for CLECs, such as:

Deficiency in Qwest Documentation Management	Impact on CLECs
Absence of author and/or issued by information	CLECs are unable to identify the proper contact person(s) within Qwest to address issues related to documentation errors and/or updates.
Absence of relevant Qwest business unit(s) and/or department(s)	CLECs are unable to assess changes and design training.
Absence of release and/or effective date(s)	CLECs are unable to schedule training, prepare systems, understand when changes go into effect, and comply with Qwest practices.
Absence of page numbers	Readers lack references to content.
Absence of version control and/or release history	Time-consuming and labor-intensive process for CLECs to manage changes.
Absence of applicability information and/or assumptions	Difficult to understand relevance and pre-requisites. Lack of clarity and increased possibility of errors.
Absence of change log and/or "change tracker" information	Time-consuming and labor-intensive process for CLECs to identify and apply changes.

The absence of consistent document management makes it difficult for the CLEC to identify changes, implement training, update systems, and comply with Qwest practices, possibly resulting in negative impact on CLEC business operations and profitability. It is both time-consuming and potentially error-causing for CLECs to manually compare different versions of the same document, to identify changes to Qwest wholesale systems, products, and processes. Furthermore, CLECs may need additional resources to validate Qwest documentation, thereby increasing operating cost.

Appendix A

Data Points

KPMG Consulting analyzed a random sample of 16 publicly available Qwest documents for documentation management practices. The data points included in this test sample are as follows:

1. *Qwest Service Interval Guide for Resale and Interconnection Services*⁵
2. *Qwest Service Interval for Access Services*⁶

⁵ Document http://www.qwest.com/wholesale/downloads/2001/011203/SIG_Interconnection120301.pdf
moved from http://www.qwest.com/wholesale/downloads/2001/011102/SIG_Interconnection110201.doc

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3. *Qwest Getting Started as a CLEC*⁷
4. *Qwest Billing Percentage Development Worksheet*⁸
5. *Qwest Competitive Local Service Schedule*⁹
6. *Qwest New Customer Questionnaire*¹⁰
7. *Qwest Customer Information and Media Provisioning (EDATA)*¹¹
8. *Qwest Fiber Data Reports User Guide*¹²
9. *Qwest Central Office Space, Power & DS3 Denial Report*¹³
10. *Qwest Technical Document Primary Rate ISDN Service*¹⁴
11. *Qwest Customer Electronic Maintenance & Repair (CEMR) User's Guide*¹⁵
12. *Qwest IMA Data Document for the Stand Alone Test Environment (SATE)*¹⁶
13. *Qwest Co-Provider Change Request Form Instructions Co-Provider*¹⁷
14. *Qwest Summary Change Management Process (CMP) Product/ Process*¹⁸
15. *Qwest Held, Escalated & Expedited Tool (HEET) Job Aid*¹⁹
16. *Qwest 12-Month Targeted OSS Interface Release Schedule*²⁰

⁶ Document <http://www.qwest.com/wholesale/downloads/2000/001031/SIGAccess103100.pdf> moved from <http://www.qwest.com/wholesale/downloads/2000/001031/SIGAccess103100.doc>

⁷ Document <http://www.qwest.com/wholesale/downloads/2001/011203/CLECCheck120401.doc> moved from <http://www.qwest.com/wholesale/downloads/2001/011018/CLECCheck101901.doc>

⁸ Document http://www.qwest.com/wholesale/downloads/2000/billing_percentage.pdf moved from http://www.qwest.com/wholesale/downloads/2000/billing_percentage.doc

⁹ Document Qwest Utility Code U-5335-T Regulations. Terms, Conditions, Rates and Charges applying to Communications Services within the State of California
http://tariffs.uswest.com:8000/docs/TARIFFS/California/QCC_AST/CA_QCC_AST_sec1p001p010.pdf#U:SW-TOC000005

¹⁰ Document http://www.qwest.com/wholesale/downloads/2001/011002/Customer_Questionnaire_v17.doc moved from http://www.qwest.com/wholesale/downloads/2001/011022/Customer_Questionnaire_v17_10-19-01.doc

¹¹ Document http://www.qwest.com/wholesale/downloads/2001/011108/EDATA_Userguide_6t.pdf moved from http://www.qwest.com/wholesale/downloads/2001/010709/EDATA_Userguide_6.doc

¹² Document <http://www.qwest.com/wholesale/downloads/2001/011204/ACCESSINGFIBERDATAREPORTS.pdf> moved from

<http://www.qwest.com/wholesale/downloads/2001/010801/ACCESSINGFIBERDATAREPORTS.doc>

¹³ Spreadsheet <http://www.qwest.com/wholesale/downloads/2001/011129/SpaceDenialSpreadsheetV2-0112101.xls> moved from

http://www.qwest.com/wholesale/downloads/2001/011101/Space_Denial_SpreadsheetV2-0_103101.xls

¹⁴ Document moved from <http://www.qwest.com/wholesale/downloads/2001/011013/77400IssueA.pdf>

¹⁵ Document http://www.qwest.com/wholesale/downloads/2001/010829/01-Cover_Page525.doc

¹⁶ Document <http://www.qwest.com/wholesale/downloads/2001/011128/DataDocumentV8.07.doc> moved from http://www.qwest.com/wholesale/downloads/2001/011102/Data_Document_V_8_05_103101.doc

¹⁷ Document http://www.qwest.com/wholesale/downloads/2001/011120/CR_Form_11-02-01_rev9_ro.doc moved from http://www.qwest.com/wholesale/downloads/2001/010313/Co-Pro_Change_Req_Form_Inst_031301.doc

¹⁸ Document http://www.qwest.com/wholesale/downloads/2001/011205/CLEC_CMP_ProductProcess_Interactive_Report.PDF moved from http://www.qwest.com/wholesale/downloads/2001/011029/CLEC_Change_Request-ProductProcess_Summary_Report.PDF

¹⁹ Document <http://www.qwest.com/wholesale/downloads/2001/010921/HEETJobAid.doc>

²⁰ Presentation <http://www.qwest.com/wholesale/downloads/2001/010724/12monthTgtOSSSched.ppt>

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Qwest OSS Evaluation

Criteria:

For the purpose of this test, KPMG Consulting applied the following document management standards to assess whether Qwest's CMP documents provided a consistent and clearly defined level of information:

- Existence of author and/or issuer information;
- Existence of relevant Qwest business unit(s) and/or department(s);
- Existence of release date and/or effective date information;
- Existence of page numbers;
- Existence of version control and/or release history;
- Existence of applicability information and/or assumptions; and
- Existence of change log and/or "change tracker"²¹ information.

Findings:

KPMG Consulting found that a number of documents did not comply with the above documentation standards. Of the 16 documents sampled, only two satisfied all requirements: the *Qwest Competitive Local Service Schedule* (#5) and *Qwest Customer Electronic Maintenance & Repair (CEMR) User's Guide* (#11). The table below summarizes the results of this documentation analysis.

Qwest Document Name	Author/ Issued By	Business Unit/ Department	Release/ Effective Date	Page #	Version Control/ Release History	Applicability/ Assumptions	Change Log/ Track Changes
SIG for Resale and Interconnection Services	N	N	Y(1)	Y	N	N	N
SIG for Access Services	N	N	Y(1)	Y	N	N	N
Getting Started as a CLEC	N	N	Y(1)	Y	N	N	N
Billing Percentage Development Worksheet	N	N	Y	Y	N	N	N
Qwest Tariffs	Y	Y	Y	Y	Y	Y	Y
Qwest New Customer Questionnaire	N	N	Y(1)	Y	Y	N	N
Customer Information and Media Provisioning (EDATA)	Y	Y	Y	Y	Y	Y	N
Qwest Fiber Data Reports User Guide	Y	Y	Y	Y	Y	Y	N
Qwest Central Office Space, Power & DS3 Denial Report	N	N	Y(1)	N	N	N	N
Qwest Technical Document Primary Rate	Y	Y	Y	Y	Y(2)	Y	N

²¹ Feature in MS Word that is used to visualize document revisions

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Qwest OSS Evaluation

Document Name	Author/Issued By	Business Unit/Department	Release Effective Date	Page	Version Control/Release History	Applicability/Assumptions	Change Log/Track Changes
ISDN Service							
Customer Electronic Maintenance & Repair (CEMR) User's Guide	Y	Y	Y	N	Y	Y	Y
Qwest IMA Data Document for the Stand Alone Test Environment (SATE)	Y	Y	Y(1)	Y	Y	Y	N
Co-Provider Change Request Form Instructions	Y	Y	Y(1)	N	N	N	N
Summary Change Management Process (CMP) Product/ Process	N	N	Y	Y	N	N	N
Held, Escalated & Expedited Tool (HEET) Job Aid	N	N	Y	N	N	N	N
Qwest 12-Month Targeted OSS Interface Release Schedule	N	N	Y	Y	N	N	N

Legend:

Y – Yes, attribute identified

N – No, attribute not present

(1) Document date in filename only²²

(2) Document is simultaneously marked "Final Draft" and "Issue A"²³

Qwest Formal Response (12/19/01):

Based upon CLEC-Qwest processes agreed to in CMP Redesign for managing PCAT and Tech Pub documentation, Qwest is in the process of developing documentation control methodologies that can be implemented for all CLEC documentation. All documentation applicable to CLECs will follow these processes as soon as they are implemented. These processes will be in place and communicated to the CLECs no later than January 31, 2002.

KPMG Consulting's First Response (01/06/02):

KPMG Consulting reviewed Qwest's response, and is aware of Qwest's effort to develop a documentation control process for all documents utilized by CLECs, including, but not limited to, PCAT and Tech Pub documentation. KPMG Consulting will conduct retesting after Qwest has implemented the referenced documentation control process, and

²² Refer to footnotes number 5 through 20 in this document

²³ Final Draft and Issue A are a combination of terms that may be misleading if readers presume that the document is to be updated.

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Qwest OSS Evaluation

requests that Qwest provide related process documentation after it becomes available. KPMG Consulting will then evaluate the process and documentation, relative to the document management issues raised in this Exception.

KPMG Consulting recommends that this Exception remain open pending retesting, following Qwest's implementation of the documentation control process, and delivery of related process documentation.

EXHIBIT 17

OBSERVATION 3067 – FIRST RESPONSE

Qwest OSS Evaluation

Initial Release Date: December 12, 2001

First Response Date: January 6, 2002

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Change Management Test, MTP Test 23.

Observation:

Qwest Systems Change Management Process (CMP) lacks guidelines for prioritizing and implementing CLEC-initiated systems Change Requests (CRs).

Background:

The Qwest Systems CMP is the method used by both Qwest and CLECs to implement changes to Qwest wholesale OSS interfaces. This process includes initiation, clarification/evaluation, presentation, prioritization, implementation, and completion of all proposed changes. CLECs participate in the CR Prioritization Process to vote on CRs that have been submitted by both Qwest and CLECs¹. The outcome of this CR Prioritization Process determines if CRs deemed critical to CLEC business operations will be included in an upcoming OSS release.

Issue:

Qwest Systems CMP lacks documented guidelines for prioritizing and implementing CLEC-initiated systems CRs. KPMG Consulting reviewed existing Qwest documentation, including the Co-Provider Industry Change Management Process (CICMP) Document and the CICMP – CR Prioritization Process Document², and noted the following:

- Qwest documents lacked information on the roles and responsibilities of Qwest staff involved in the analysis of CLEC-initiated systems CRs;
- Qwest documents lacked information on how Qwest allocated available resources (capacity) for all systems CRs to be included in an OSS release;
- Detailed business analyses and system analyses from the Qwest software development team were not performed for all CLEC-initiated CRs;
- Qwest documents lacked definitions and criteria for the Level of Effort (formerly known as “T-shirt size”) assignment for individual CRs; and

¹ In the context of CMP Redesign, Qwest and CLECs have not yet agreed on whether or not regulatory and industry guideline CRs are subject to the CR Prioritization Process.

² The CICMP Document and CICMP – CR Prioritization Process Document, located at www.qwest.com/wholesale/cmp/whatiscmp.html, represent the most recent Qwest documents relevant to the CR Prioritization Process prior to the initiation of CMP Redesign.

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- Qwest documents lacked information on how Qwest identified CR package options for a software release that it recommended to CLECs, following the CR Prioritization Process.

Impact:

In the absence of guidelines for the system CR Prioritization Process, there is no assurance that all CRs receive a thorough assessment from the Qwest software development team. In addition, it is unclear how Qwest allocates resources for the wholesale OSS to accommodate CLEC business needs, and how Qwest estimates the resources required to complete individual CLEC-initiated CRs. Failure on the part of Qwest to attend to CRs that CLECs deem critical to CLEC business operations in a timely manner may result in lengthy delays in implementing these changes. In fact, the limited capacity that Qwest allows for each release may categorically prevent the implementation of some CRs.

Qwest Formal Response (12/20/01):

Qwest responses to the 5 KPMG stated issues.

1. *"Qwest documents lacked information on the roles and responsibilities of Qwest staff involved in the analysis of CLEC-initiated systems CRs."*

Once approved by the Re-design Team, the Master Redline CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 12-10-01, located at <http://www.qwest.com/wholesale/cmp/redesign.html>, will further illuminate the process, roles and responsibilities of Qwest personnel during the preliminary evaluation and subsequent prioritization of CLEC-initiated systems CRs.

2. *"Qwest documents lacked information on how Qwest allocated available resources (capacity) for all systems CRs to be included in an OSS release."*

Qwest and the CLECs are currently negotiating the extent to which Qwest will disclose this business information to the CLECs. This issue will be resolved and included in the Qwest Proposed Prioritization Language when it is accepted by the Re-design Team.

3. *"Detailed business analyses and system analyses from the Qwest software development team were not performed for all CLEC-initiated CRs."*

Detailed business and systems requirement development occurs after the CLECs and Qwest prioritize the list of CLEC initiated CRs pursuant to the Co-Provider Industry Change Management Process document, Section IV. Additionally, the Qwest Proposed Prioritization Language, collaboratively written by Qwest and the CLECs, but not yet adopted by the Re-design Team, details the following:

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- There is insufficient space to include all CLEC initiated CRs in the upcoming release. The prioritization process channels the business and system requirements development effort.
 - The business and system requirement development effort begins with CRs at the top of the prioritization list and continues down the list until all available development resources are exhausted.
 - Business and systems requirements are developed for more CRs than can ultimately be included in the release.
4. *"Qwest documents lacked definitions and criteria for the Level of Effort (formerly known as "T-shirt size") assignment for individual CRs."*

The *Co-Provider Industry Change Management Process* document does not have specific definitions for Level of Effort. However, in the *Master Red-Lined CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 11-29-01* the following language has been agreed to in the *CLEC-Qwest OSS Interface Change Request Initiation Process* section:

"Identification of the preliminary level of effort (S, M, L, XL) required to implement the CR.

- Small – requires changes to only one subsystem of a single system
- Medium – requires changes to 2 or more subsystems of a single system
- Large – requires changes to 2 or more systems or complex changes in multiple subsystems of a single system
- Extra Large – requires extensive redesign of at least one system."

Additionally, Qwest and the CLECs are currently negotiating a refined preliminary Level of Effort criteria based on a rough estimate of the number of people-hours necessary to complete a CR.

5. *Qwest documents lacked information on how Qwest identified CR package options "for a software release that it recommended to CLECs, following the CR Prioritization Process."*

The CLEC-Qwest OSS Interface Change Request Initiation Process section of the *Master Red-Lined CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 12-10-01* provides the following language which has been agreed to by the CLECs and Qwest:

"At the monthly CMP meeting following the completion of the business and system requirements, Qwest will conduct a packaging discussion, which may include packaging options based on any affinities between candidates on the release candidate list. The newly packaged list of CRs will be used as the release candidate list during the design phase of a release. At the monthly CMP meeting

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following the completion of design, Qwest will commit to a final list of CRs for inclusion in the release.”

KPMG Consulting’s First Response (01/04/02):

KPMG Consulting reviewed Qwest’s responses, and identified the following issues:

1. KPMG Consulting reviewed the *Master Redline CLEC-Qwest CMP Re-Design Framework* document but is unable to identify information therein that describes the roles and responsibilities of Qwest staff who conduct business and system analyses of CLEC-initiated systems CRs.
2. KPMG Consulting is aware of the ongoing CMP Redesign effort, and requests that Qwest provide related documentation for review, once it is finalized.
3. KPMG Consulting is aware of the possibility that not all CLEC-initiated, CLEC-prioritized CRs may be included in a given, upcoming release. It is thus critical that Qwest’s software development team conducts a thorough assessment of all CRs, and provides CLECs with adequate information (see the following paragraph) so that CLECs are able to make informed decisions about *all CRs* during the prioritization process.
4. Based on the definitions of the preliminary levels of effort (S, M, L, and XL), KPMG Consulting could not quantify the amount of work performed by the Qwest software development team, or the total amount of work required for each software release. It is unclear how the above specifications would inform CLECs of the overall capacity of a given, upcoming release, and enable CLECs to make informed decisions on the bases of interdependences, as well as tradeoffs, among numerous CRs, during the prioritization process.
5. KPMG Consulting reviewed the cited text and is unable to identify the criteria that Qwest software developers utilize to identify affinities between candidates.

KPMG Consulting recommends that this Observation remain open pending resolution of the above issues.

EXHIBIT 18

Test Vendor ID: OBS 3052
Qwest Internal Tracking ID: TI 676
Observation/Exception Title: Change Management Process
Test Type/Domain: Test 23- Change Management
Date Qwest Received: 11/08/2001
Initial Response Date: 11/15/2001
1st Supplemental Response Date: 11/28/2001
2nd Supplemental Response Date: 12/05/2001
3rd Supplemental Response Date: 12/28/2001
4th Supplemental Response Date: 01/07/2002
5th Supplemental Response Date: 01/11/2002

Test Incident Summary:

An observation has been identified as a result of the test activities associated with the Change Management Review, MTP Test 23.

Observation:

Qwest's Change Management Process (CMP) does not have documented contingency plans and/or processes to correct failures in the production version(s) of OSS interfaces.

Background:

Production support changes address defects in the production version(s) of an OSS interface. Such defects may include interrupted connectivity, failed transactions, system crashes, degraded performance, data corruption, memory leaks, and/or functionality not coded to specification.

The purpose of a production support process is to quickly and effectively restore critical production components by repairing defects or implementing temporary work-around processes. This process would also include the implementation of a tactical plan to complete restoration of normal production capabilities. For critical situations, standard software release intervals would be too long to implement through the established change management process.

Issue:

KPMG Consulting observed that Qwest CMP does not have a documented process to address production support changes. However, Qwest states in a recent public filing¹ that:

¹ *Qwest Corporation's Report on the Status of Change Management Process Redesign before the Public Utilities Commission of the State of Colorado*, dated 10/10/2001, page 7.

"While the parties² have not fully discussed or reached agreement on the categories of changes to be included in Qwest's CMP, Exhibit A includes all five categories of system changes included in SBC's [SBC Communications, Inc.] documents. Those categories are listed in Exhibit A under the heading Changes to Existing Interfaces. *Qwest has already implemented the five categories of changes in its OSS CMP process.*" [Italics added]

According to Exhibit A³, the five categories of changes are defined as follows:

- | | |
|--------|---------------------------|
| Type 1 | Production Support change |
| Type 2 | Regulatory change |
| Type 3 | Industry Guideline change |
| Type 4 | Qwest Originated change |
| Type 5 | CLEC Originated change |

KPMG Consulting infers from the above statements that Qwest has a documented process in place to support Type 1 Production Support changes in the CMP Process.

KPMG Consulting examined the Qwest Change Management Process and established guidelines, but could not locate documentation to support the above statement in italics. The *Co-provider Industry Change Management Process (CICMP) Document*⁴ and the *IMA Change Management Document*⁵ define various change request processes, but lack specific information about production support changes that need to be processed on an expedited basis.

Question:

1. Does Qwest have documented contingency plans and/or processes to correct failures in the production version(s) of OSS interfaces? If so, KPMG Consulting requests that Qwest provide the document(s) for review.

Qwest Formal Response

Qwest confirmed that Qwest OSS contingency plans exist and are utilized by production support teams. The Qwest OSS Contingency Plan process is as follows:

1. The first point of contact for a CLEC to report a production problem is the Wholesale Systems Help Desk (WSHD). If the WSHD determines that a system needs to be involved to resolve the problem, they will contact the AIP/Client Services team.
2. The AIP/Client Services team accepts and researches production concerns received from the WSHD. They create Problem Management Record (PMR) tickets in the Problem Change Record Management (PCRM) system to track the issues. These tickets are then assigned to the production support team for the affected system. The AIP/Client Services team process is outlined on their website at: http://ima-aip/trouble/newones/Ticket_Escalation.htm. This document will be provided as a confidential data request attachment.
3. If the problem requires an immediate system change, this information is handed off to the development team for the affected system. The production patch request process is then initiated.

² The term "parties" refers to Qwest and those CLECs involved in the CMP Redesign Process.

³ *Master Redlined CLEC-Qwest CMP Redesign Framework*, draft revised 10/3/2001.

⁴ The *CICMP Document* dated 5/11/2001 was the last CMP document before the start of CMP Redesign. It is located at <http://www.qwest.com/wholesale/cmp/whatiscmp.html>.

⁵ The *IMA Change Management Document* defines the process through which Qwest prioritizes and processes Change Requests for IMA software releases.

Qwest is in the process of collecting all contingency plans and/or processes that exist to correct potential failures in the production versions of each OSS interface. These plans and/or processes will be provided to KPMG by November 27, 2001 as a supplemental response to Observation 3052.

Qwest Supplemental Response (11/28/01):

Qwest is providing contingency plans and/or processes that exist to correct potential failures in the production versions of OSS interfaces via the usual data request process (DR no. TI-676S1) for the following systems:

- CPPD (CPS)
- CRIS
- EXACT
- IABS
- IMA
- MEDIACC/CEMR

Qwest is still in the process of collecting contingency plans and/or processes for the following systems:

- HEET
- TELIS

The plans and/or processes for HEET and TELIS will be provided to KPMG by December 4, 2001 via the usual data request process (DR no. TI-676S2).

Qwest 2nd Supplemental Response (12/05/01):

Qwest has completed the collection of contingency plans for the HEET and TELIS systems. Qwest provided the HEET documentation via DR no. TI-676S2 on 12/4/01.

TELIS is a Cap Gemini Ernst & Young (CGE&Y) system. Qwest follows the procedures outlined in the CGE&Y document titled "Notification of Software Defects and Severity Levels." This document defines procedures for notifying CGE&Y of defects, defect management by CGE&Y and escalation procedures. The document is CGE&Y proprietary and can not be distributed.

KPMG Comments (12/20/2001):

Documentation Review

KPMG Consulting confirms that it received the following documents from Qwest:

1. AIP/Client Services: *Application in Production Ticket Escalation and Referral Process* dated November 16, 2001⁶;
2. CPPD: *Co-Provider Product Data System Support Plan* dated February 7, 2000⁷;
3. CRIS (BCOE): *Billing Center of Excellence Problem Management Process* dated February 14, 2001⁸;
4. IABS: *IABS Problem Management Process Definition* dated September 6, 2001⁹;
5. IMA: *Production Patch Process* (not dated)¹⁰;

⁶ KPMG Consulting Data Request TI-676 Confidential Information.

⁷ KPMG Consulting Data Request TI-676S1 Confidential Attachment A.

⁸ KPMG Consulting Data Request TI-676S1 Confidential Attachment B

⁹ KPMG Consulting Data Request TI-676S1 Confidential Attachment C.

6. MEDIACC/CEMR: *Production Support/Wholesale System Help Desk Problem/Outage Management Process* (not dated)¹¹;
7. HEET: *Application Support & Change Management Plan* dated November 27, 2001¹².

KPMG Consulting did not receive the data items relevant to EXACT and TELIS, that are referenced in Qwest's supplemental response. Qwest indicated that the TELIS system documentation is proprietary and cannot be distributed to KPMG Consulting for purposes of this review. KPMG Consulting requests that Qwest provide the EXACT document as a supplement to Data Request reference number TI-676S2.

KPMG Consulting identified acronyms and/or systems that were not fully defined in the Qwest contingency plans:

- Document #2 referred to Polytron Version Control System (PVCS);
- Documents #1, 3 & 6 referred to Problem Change Request Management (PCRM);
- Document #1 referred to TPSP (no definition provided).

KPMG Consulting will formally submit a Data Request for documentation that provides more detailed information regarding these systems.

KPMG Consulting reviewed Qwest's responses, along with the documents it received, and noted the following issues:

- A. Four out of the seven documents do not contain essential document management elements such as issue date, version number, author/business unit, change log, and assumptions;
- B. Several documents do not provide definitions for participants and stakeholders (i.e., user, client, requestor, originator, etc);
- C. The process documents do not specify the definition and scope of production support issues;
- D. The documents lack clarity regarding if, and how, CLECs interact with Qwest business units for OSS problems;
- E. Several documents do not specify that Qwest should notify CLECs about the severity of a trouble ticket, or that CLECs can influence the severity assigned;
- F. The documents lack intervals for notification, escalation, and resolution;
- G. The documents do not specifically address the following:
 - planned and unplanned system outages;
 - slow response;
 - system availability; and
 - production support CRs.

Please refer to confidential Appendix A for KPMG Consulting's detailed analysis of the above seven documents.

Process Review

KPMG Consulting reviewed Qwest documents that specified OSS contingency plans, and found that these documents lack specific references to, and consideration of, Qwest interactions with CLECs. These contingency plans illustrate fragments of a production support framework, but do not constitute a comprehensive process that defines how this change category is integrated into the overall CMP.

In the absence of a comprehensive process document, KPMG Consulting was unable to validate specific steps and timelines related to each of the following production support processes:

¹⁰ KPMG Consulting Data Request TI-676S1 Confidential Attachment D.

¹¹ KPMG Consulting Data Request TI-676S1 Confidential Attachment E.

¹² KPMG Consulting Data Request TI-676S2 Confidential Attachment A

- A. Identification and verification procedures;
- B. Evaluation, categorization, and prioritization procedures;
- C. Internal and external communication procedures;
- D. Status tracking and reporting procedures;
- E. Escalation procedures;
- F. Restoration and closure procedures;
- G. Testing procedures, including test environments; and
- H. Documentation management procedures.

KPMG Consulting requests that Qwest describe how production support issues and production support changes are handled on an expedited basis. Production support has been defined as the process by which CLECs interact with Qwest to resolve time sensitive production issues and changes. It is critical that Qwest (internal and external) processes be clearly documented, well formed, and described, within the context of the overall CMP. In the absence of a comprehensive framework for production support issues and changes, there is no assurance that Qwest OSS functionalities consistently meet the needs of CLEC business operations.

Question:

1. What, if any, Qwest documentation, either provided to CLECs or used as internal guides, exists that describes production support changes as a uniform process?

KPMG Consulting recommends that Observation 3052 remain open pending resolution of the above issues.

Qwest Response to KPMG Comments (12/28/01):

Qwest has defined Polytron Version Control System (PVCS), Problem Change Request Management (PCRM) and TPSP in its responses to data requests CM28, CM29 and CM30 respectively.

The CMP Redesign Core Team has tentatively agreed upon language for Production Support, which addresses defects of systems and documentation. Refer to *Attachment A: Production Support*. Qwest has addressed creation and implementation of an integrated change management process that addresses both system enhancements and the correction of system bugs and documentation inaccuracies. Systems enhancements are addressed in the *Changes to An Existing OSS Interface* section of the *Master Redlined CLEC-Qwest CMP Re-design Framework – Revised 12-10-01* (<http://www.qwest.com/wholesale/cmp/redesign.html>). (See Attachment B: *Change to An Existing OSS Interface*.)

The CMP documents referred to above as Attachments A and B, and provided to CLECs, define a uniform process for production support and changes to OSS interfaces.

As stated in Qwest's Formal Response on November 15, 2001, when the Wholesale Systems Help Desk determines that a CLEC reported trouble may require a back-end system fix, the trouble report is handed off to the appropriate back-end system. Each Qwest back-end system will follow its own process for problem resolution and prioritization of fixes and communicate status back to the Help Desk. The Wholesale Systems Help Desk will then communicate trouble ticket status back to the CLEC. The Wholesale Systems Help Desk is the single point of contact with the CLEC regarding the status of trouble tickets.

The Qwest Wholesale Systems Help Desk will update its methods and procedures and conduct training by January 3, 2002 to ensure that Help Desk personnel follow the procedures outlined in the CMP Production Support document (*Appendix A*).

Qwest will update the following back-end system documents previously provided in Data Requests TI-676, TI-676S1 and TI-676S2 to include a description of the process of handing off Help Desk trouble tickets (including those generated by CLECs) from the Wholesale Systems Help Desk and the requirement to communicate status back to the Help Desk. Qwest will also update these documents to include current "document management elements" and participant and stakeholder information. These documents will be updated by January 10, 2002:

-
- 1 AIP/Client Services: *Application in Production Ticket Escalation and Referral Process* dated November 16, 2001
 - 2 CPPD: *Co-Provider Product Data System Support Plan* dated February 7, 2000
 - 3 CRIS (BCOE): *Billing Center of Excellence Problem Management Process* dated November 27, 2001
 - 4 IABS: *IABS Problem Management Process Definition* dated September 6, 2001
 - 5 IMA: *Production Patch Process* (not dated)
 - 6 MEDIACC/CEMR: *Production Support/Wholesale System Help Desk Problem/Outage Management Process* (not dated)

HEET is an obsolete system and Qwest is in the process of retiring it. Accordingly, the document "HEET: *Application Support & Change Management Plan* dated November 27, 2001" will not be updated.

Qwest Supplemental Response (01/07/2002):

The documentation updates referenced in the 12/28/01 response remain on track for a 1/10/02 completion; however, Qwest has determined that the Help Desk Personnel training will not be completed until 1/25/02.

Qwest Supplemental Response (01/11/2002):

On 1/10/02 Qwest completed the documentation updates referenced in the 12/28/01 response. The documents will be provided via the data request process (DR # TI-676-S4 - OBS 3052) on 1/11/02.

Attachment(s):

EXHIBIT 19

MEMORANDUM

DATE: January 11, 2002
TO: ROC TAG
FROM: Kyle Kirves, Hewlett-Packard Consulting
RE: Qwest Supplemental Response to Exception 2003

Summary

As documented in the Exception, Qwest does not follow its established release notification schedule when implementing IMA releases, and does not provide complete and accurate information in its release notifications to enable co-providers to prepare adequately for certification and implementation of new releases. Co-providers must complete their analysis, development, and testing efforts within a shortened time frame, which creates greater opportunity for errors to occur in a co-provider's implementation efforts. Further, Qwest's inability to provide complete and accurate release documentation in its initial delivery of release notifications greatly increases the time and resources a co-provider must commit to implementing a new IMA EDI release.

Discussion

Based upon the P-CLEC's experience in implementing EDI Release 6.0, Qwest did not follow its established release timeline, as posted on the CICMP website calendar. Because of Qwest's deviation from the posted release schedule, the P-CLEC experienced implementation planning, resource scheduling, and quality assurance issues. In the Exception, the P-CLEC provided a table comparing the targeted release dates of IMA 6.0 Release Notifications, and the actual dates on which the release notifications were distributed by Qwest. Among the late release notifications, Qwest provided the 6.0 Recertification Notice on the same day Release 6.0 was implemented and three weeks after the projected delivery date.

Further, this Exception noted that Qwest release notifications do not always provide complete and accurate information. As examples, the Exception cited Qwest's release of a clarification to the Release 6.0 Baseline Candidates on August 23, 2000 – more than one month after the CICMP calendar delivery date (July 20, 2000) and the release of the initial Baseline Candidates notification (July 21, 2000). The Exception also reported that Qwest had to release two addenda to its EDI Release 6.0 Disclosure Documents, published after the release of IMA 6.0 to correct errors in the original Disclosure Documents.

The P-CLEC found the implementation of the two addenda to be cumbersome due to its impact on the integrity of the EDI mapping applications and the piece-meal nature of arriving at a complete set of business rules specifications. Additionally, the analysis of the change summaries was confusing because it was not evident whether the second addendum was inclusive or exclusive of the changes noted in the first addendum. This confusion is compounded by the fact that Qwest does not provide a documented

process that details how a co-provider should implement changes noted in Disclosure Document addenda.

In Qwest's response to the cited issues, it indicated that it does not believe this Exception documents a problem with its systems or processes. Qwest indicated that, during the EDI implementation process with a co-provider, Qwest provides a timeline of when Release Notifications were and will be published and made available to the co-provider, and stated it believes this process adequately addresses the necessary implementation planning and scheduling activities. Qwest noted that, while it is desirable to meet or exceed all published target release dates, there is a notice on the CICMP Release Calendar that all proposed IMA release dates are only targets and changes may occur during an IMA release life cycle that impact these target dates. Should changes occur, Qwest stated it would update its target dates and communicate this to the co-provider.

With respect to the Exception's use of the delayed IMA 6.0 Re-certification Notice, Qwest indicated that, during the conversion to a new IMA EDI Release, it is the co-provider's responsibility to initiate the migration process. An initial migration meeting will be held to discuss re-certification, migration strategy and data conversion. A project plan will be developed and mutually agreed upon to assist in the scheduling of appropriate resources for the migration.

HP Recommendation

HP does not believe that Qwest has fully addressed the issues raised in this Exception. First, while Qwest notes that its published target release dates may change during the life cycle of an IMA release, Qwest has not addressed the impact that such delays have on a co-provider's ability to accommodate and plan for new release implementations on a shortened timeframe. Co-providers plan their release implementations based on the release calendar provided by Qwest. If a co-provider cannot be assured that targeted release dates will be met, it will have difficulty coordinating the necessary resources to implement the new release. Further, when a documentation release is delayed, co-providers must alter their development and implementation plans to ensure that the appropriate resources are available to complete the necessary review and development in the shortened timeframe.

Second, Qwest indicated in its response that the co-provider is responsible for initiating the migration process to a new release, and that, consequently, its publishing of the IMA 6.0 Re-certification Notice three weeks behind schedule, and on the same date IMA Release 6.0 was implemented, does not constitute a problem. While HP accepts that the co-provider may be responsible for initiating migration to a new IMA release, this does not remove from Qwest the responsibility to notify co-providers in a timely manner that re-certification and migration plans need to be developed. The Re-certification Notice is important to co-providers in their planning for the migration process in that it provides the timeframes in which re-certification must be completed.

Third, in addition to Qwest's delayed publishing of Release Notifications, this Exception also addressed the issue of Qwest's frequent re-release of Release Notices and Disclosure Documentation. As was documented in the Exception, when Qwest

releases addenda to its documentation, co-providers are forced to develop their interfaces in a piece-meal fashion and often have to re-code their EDI maps to account for changes to Qwest's business rules specifications. This requires co-providers to devote additional time and resources to the development and implementation of new IMA releases. In its response, Qwest did not address this deficiency in its release change management process.

HP recommends that this Exception remain open pending the outcome of the current ROC TAG review of proposed Change Management Performance Indicator Definitions (PIDs). Of the Change Management PIDs under consideration, this Exception directly correlates to "PO-16 Timely Release Notifications," proposed by Qwest and "RQ-3 Release Quality," proposed by the co-provider community. Implementation of these PIDs will require Qwest to resolve the root cause of the issues cited in this Exception in order to meet established benchmark performance standards.

Further, HP requests clarification with regard to the multiple releases of Disclosure Document addenda and release notifications cited in this Exception, as these multiple releases have a significant effect on the quality and reliability of an IMA EDI Release, and impact a co-provider's ability to plan, develop, test and implement its EDI interface. The attached table¹, identifying the multiple revisions and addenda to the IMA Release 6.0 Disclosure Documents, shows the magnitude of this impact on co-providers.

Qwest Supplemental Response to HP Comments (June 28, 2001):

Qwest is making a proposal to change its change management program to meet the needs of the industry and align Qwest with evolving industry directions. To this end, Qwest is working this issue in the regulatory workshops and the CICMP Forum and has prepared a proposal for collaborative development of a change management program that will address the concerns raised in this and other observations. The details of the program will be collaboratively refined with the CLECs in the Qwest CICMP forum. Qwest has identified and expects the program to contain the following elements, some of which address the issues raised in this observation. For example:

- On a quarterly basis, Qwest would begin sharing with Co-Providers its 12-Month Development View (View) that includes all proposals that impact Co-Providers—those initiated by Qwest and Co-Providers. Co-Providers would then have an opportunity to provide Qwest with input to the development plan.
- Qwest proposes to improve its application-to-application notification process to meet the requirements proposed by the industry's Ordering and Billing Forum (OBF) with Issue 2233. Qwest proposes to incorporate into the CICMP Qwest initiated CRs which impact Co-Providers, classify and prioritize CRs by severity type and collaborate with CLECs to develop system releases that include and meet regulatory, system and CLEC requirements.
- In addition, Qwest's proposal will include guidelines and procedures for:

¹ EXC2003 HP Reply Attachment

- Escalations/Expedites of changes
- New and/or Retired Interfaces
- Change notification for Products/Processes

Qwest believes that this comprehensive and collaborative approach to change management will address these issues and align Qwest with the direction the industry is taking with change management. Additional information/details will be available once the work in regulatory workshops and with the CLECs has concluded.

Qwest is in ongoing negotiations with the ROC TAG to arrive at agreement on two Change Management Performance Indicator Definitions (PIDs). The Change Management PIDs under consideration include "PO-16 Timely Release Notifications," and "GA -7 Software Outage Resolution". A meeting was held June 20th to review the latest drafts of these proposed PIDs. In that meeting tentative agreement was reached on PO-16. Formal TAG approval is expected in the June 28th TAG meeting. Qwest needs to provide a response to two outstanding issues on GA -7 and expects approval upon satisfactory resolution of these two issues. Implementation of these PIDs will require Qwest to resolve the root cause of the issues cited in this Exception in order to meet established benchmark performance standards. Qwest does not support the third Change Management PID, "RQ-3 Release Quality," proposed by the co-provider community. This PID proposal is at impasse and under review by the ROC Steering Committee.

HP Supplemental Recommendation (July 13, 2001):

HP agrees with Qwest's proposal in their Supplemental Response dated 6/28/2001:

"Qwest is making a proposal to change its change management program to meet the needs of the industry and align Qwest with evolving industry directions."

Due to the nature of the complexity of the solution to this Exception and the length of time it will take for Qwest to implement, HP recommends that this Exception remain open pending the successful implementation of the changed CICMP process.

Based on Qwest's Agenda provided for the July 11th, 2001 "CLEC/Qwest working session to modify the Change Management Process", there will be a timeline adapted for proposal review with the CLEC community.

And further based on the outcome of the timeline development, HP will provide an update to this Exception recommendation on a quarterly basis.

Qwest Supplemental Response to HP Comments (December 17, 2001):

Qwest held a call on December 13 with HP to clarify remaining questions in order to close this observation. Qwest will proceed to answer the remaining questions listed below from this call.

1. Has Qwest addressed the impact that changes to published target release dates during the life cycle of an IMA release have on a co-provider's ability to accommodate and plan for a new release implementations on a shortened timeframe?

Qwest Response: Qwest has addressed the impact that changes to published target release dates have on a CLEC's ability to accommodate and plan for a new release. In the CMP Redesign effort, Qwest and CLECs have collaboratively developed language governing IMA-EDI releases. This language is included in the *Changes to Existing OSS Interfaces* section of the *Master Redlined CLEC-Qwest CMP Re-design Framework - Revised 12-10-01* (<http://www.qwest.com/wholesale/cmp/redesign.html>). This section details how Qwest will follow a 73-calendar day timeframe, beginning with the publication of draft technical specifications, similar to the timeline outlined in the proposed Ordering and Billing Forum (OBF) guidelines. Qwest will begin implementation of this timeline and language beginning with IMA-EDI release 10.0.

2. Has Qwest addressed requirements for Re-certification Notice to co-providers that re-certification and migration plans need to be developed? Timeframe requirements? Content requirements?

Qwest Response: The CMP Redesign team, along with Qwest, is negotiating refined language to the existing certification and re-certification processes, including discussion of migration test planning, content, and timeframes. Qwest has provided the Redesign Team with proposed language addressing these subjects. The Redesign Team will address these issues at the January 22, 23, and 24 Redesign session.

3. Has Qwest addressed issues with regard to the multiple releases of Disclosure Document addenda and release notification releases?

Qwest Response: Qwest will propose language on January 18, 2002, that will address the CLEC's concerns regarding multiple changes to Disclosure Documentation in a post production environment that require changes to CLEC's systems. Addendum language will be discussed and potentially agreed upon during the January 22, 23, and 24 Redesign session.

4. Has Qwest addressed deficiencies in its release change management process related to Qwest's release of addenda to its documentation?

Qwest Response: See Qwest's response to #3 above.

HP 2nd Supplemental Reply (January 11, 2002):

Qwest's responses to Questions #2 and #3 indicate that the CMP Re-Design Core Team will be reviewing proposals related to the resolution of the Exception during the January 22-24 redesign meetings.

Also, Qwest indicates in its response to Question #3 that it has not yet completed the proposed draft language or provided it to the redesign team. This proposed language, according to Qwest, will be available on January 18, 2002.

In order to ensure that the language proposed by Qwest, and reviewed by the CMP Re-Design team, addresses the open issues of this Exception, HP requests the following:

1. Qwest provide HP with copies of the proposed language, referenced in its responses to Question #2 and #3 above, that have been, or will be, provided to the CMP Re-Design Core Team for discussion in the January 22-24 redesign meetings; and,
2. Qwest provide HP with a summary of the discussions, and any decisions made, during the January 22-24 redesign meetings on the points that apply to the answers provided in this response.

HP will continue to monitor this Exception by means of a re-test (Category 4) and will provide a supplemental response after the above requests have been satisfied and completed.